



SOUTHERN CALIFORNIA  
ASSOCIATION OF GOVERNMENTS  
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## SPECIAL MEETING

# REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) APPEALS BOARD PUBLIC HEARING

**Remote Participation Only**

**Friday, January 8, 2021**

**9:00 a.m. – 3:00 p.m.**

**To Participate on Your Computer:**

**<https://scag.zoom.us/j/91702781766>**

**To Participate by Phone:**

**Call-in Number: 1-669-900-6833**

**Meeting ID: 917 0278 1766**

***Please see next page for detailed  
instructions on how to participate in the meeting.***

### **PUBLIC ADVISORY**

Given recent public health directives limiting public gatherings due to the threat of COVID-19 and in compliance with the Governor's recent Executive Order N-29-20, the meeting will be held telephonically and electronically.

If members of the public wish to review the attachments or have any questions on any of the agenda items related to RHNA, please send an email to [housing@scag.ca.gov](mailto:housing@scag.ca.gov). Agendas and Minutes are also available at: [www.scag.ca.gov/committees](http://www.scag.ca.gov/committees).

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. SCAG is also committed to helping people with limited proficiency in the English language access the agency's essential public information and services. You can request such assistance by calling (213) 236-1959. We request at least 72 hours (three days) notice to provide reasonable accommodations and will make every effort to arrange for assistance as soon as possible.



## Instructions for Public Comments

*You may submit public comments in two (2) ways:*

1. Submit written comments via email to: [housing@scag.ca.gov](mailto:housing@scag.ca.gov) by 5pm on Thursday, January 7, 2021.

All written comments received after 5pm on Thursday, January 7, 2021 will be announced and included as part of the official record of the meeting.

2. If participating via Zoom or phone, during the Public Comment Period, use the “raise hand” function on your computer or \*9 by phone and wait for SCAG staff to announce your name/phone number. SCAG staff will unmute your line when it is your turn to speak. Limit oral comments to 3 minutes, or as otherwise directed by the presiding officer.

If unable to connect by Zoom or phone and you wish to make a comment, you may submit written comments via email to: [housing@scag.ca.gov](mailto:housing@scag.ca.gov).

***In accordance with SCAG’s Regional Council Policy, Article VI, Section H and California Government Code Section 54957.9, if a SCAG meeting is “willfully interrupted” and the “orderly conduct of the meeting” becomes unfeasible, the presiding officer or the Chair of the legislative body may order the removal of the individuals who are disrupting the meeting.***



## Instructions for Participating in the Meeting

SCAG is providing multiple options to view or participate in the meeting:

### To Participate and Provide Verbal Comments on Your Computer

1. Click the following link: <https://scag.zoom.us/j/91702781766>
2. If Zoom is not already installed on your computer, click “Download & Run Zoom” on the launch page and press “Run” when prompted by your browser. If Zoom has previously been installed on your computer, please allow a few moments for the application to launch automatically.
3. Select “Join Audio via Computer.”
4. The virtual conference room will open. If you receive a message reading, “Please wait for the host to start this meeting,” simply remain in the room until the meeting begins.
5. During the Public Comment Period, use the “raise hand” function located in the participants’ window and wait for SCAG staff to announce your name. SCAG staff will unmute your line when it is your turn to speak. Limit oral comments to 3 minutes, or as otherwise directed by the presiding officer.

### To Listen and Provide Verbal Comments by Phone

1. Call **(669) 900-6833** to access the conference room. Given high call volumes recently experienced by Zoom, please continue dialing until you connect successfully.
2. Enter the **Meeting ID: 917 0278 1766**, followed by #.
3. Indicate that you are a participant by pressing # to continue.
4. You will hear audio of the meeting in progress. Remain on the line if the meeting has not yet started.
6. During the Public Comment Period, press \*9 to add yourself to the queue and wait for SCAG staff to announce your name/phone number. SCAG staff will unmute your line when it is your turn to speak. Limit oral comments to 3 minutes, or as otherwise directed by the presiding officer.



# REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) APPEALS BOARD PUBLIC HEARING SPECIAL MEETING AGENDA

## RHNA APPEALS BOARD MEMBERS – RHNA 6<sup>TH</sup> CYCLE

### VOTING MEMBERS

#### **Representing Imperial County**

Primary: Hon. Cheryl Viegas-Walker, El Centro  
Alternate: Sup. Luis Plancarte, Imperial County

#### **Representing Los Angeles County**

Primary: Hon. Margaret Finlay, Duarte  
Alternate: Hon. Rex Richardson, Long Beach

#### **Representing Orange County**

Primary: Hon. Wendy Bucknum, Mission Viejo  
Alternate: **CHAIR** Peggy Huang, Yorba Linda, TCA

#### **Representing Riverside County**

Primary: Hon. Russell Betts, Desert Hot Springs  
Alternate: Hon. Rey SJ Santos, Beaumont

#### **Representing San Bernardino County**

Primary: Hon. Deborah Robertson, Rialto  
Alternate: Hon. Larry McCallon, Highland

#### **Representing Ventura County**

Primary: Hon. Carmen Ramirez, Oxnard  
Alternate: Hon. Mike Judge, Simi Valley, VCTC



# REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) APPEALS BOARD

## PUBLIC HEARING – SPECIAL MEETING AGENDA

Southern California Association of Governments  
Remote Participation Only  
**Friday, January 8, 2021**  
**9:00 AM – 3:00 PM**

### **CALL TO ORDER AND PLEDGE OF ALLEGIANCE** *(The Honorable Peggy Huang, Chair)*

### **PUBLIC COMMENT PERIOD**

Members of the public are encouraged to submit written comments by sending an email to: [housing@scag.ca.gov](mailto:housing@scag.ca.gov) by 5pm on Thursday, January 7, 2021. Such comments will be transmitted to members of the legislative body and posted on SCAG's website prior to the meeting. Written comments received after 5pm on January 7, 2021 will be announced and included as part of the official record of the meeting. Members of the public wishing to verbally address the RHNA Appeals Board will be allowed up to 3 minutes to speak, with the presiding officer retaining discretion to adjust time limits as necessary to ensure efficient and orderly conduct of the meeting. The presiding officer has the discretion to reduce the time limit based upon the number of comments received and may limit the total time for all public comments to twenty (20) minutes.

Click [here](#) to access the list of written Public Comments received as of 12/30/2020, or see the attachment.

All comments submitted are posted online at <https://scag.ca.gov/rhna-comments>.

### **ACTION ITEM/S**

1. Public Hearings to Consider Appeals Submitted by Jurisdictions Related to the 6th Cycle Draft RHNA Allocations  
*(Kome Ajise, Executive Director)*

### **RECOMMENDED ACTION:**

Review the appeals submitted by eight (8) jurisdictions regarding their respective 6th Cycle Draft RHNA Allocations; review corresponding staff recommendations as reflected in the staff reports; receive public comments; hear arguments by appellants and staff responses; and take action to grant, partially grant, or deny each appeal.

The Chair has the discretion to determine the order of appeals heard.

### Schedule

- 1.1 City of South Gate\*
  - 1.2 City of Bellflower\*
  - 1.3 City of Downey\*
  - 1.4 City of Pico Rivera\*
  - 1.5 City of Lakewood\*
  - 1.6 County of La Mirada\*
-



1.7 City of Huntington Park\*

1.8 City of Cerritos\*

**\* For each appeal, the general time allocation is as the following with Chair's discretion to grant extension as needed:**

- **Initial Arguments (5 min)**
- **Staff Response (5 min)**
- **Rebuttal (3 min)**

**For more information, please see Appeals Hearing Procedures in the Attachment.**

### **ADJOURNMENT**

***The Public Hearing to hear submitted appeals to the 6th cycle Regional Housing Needs Assessment (RHNA) Allocations will continue on January 11, 2021.***

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## ATTACHMENT - Appeals Hearing Procedures

### (Per Adopted 6<sup>th</sup> Cycle RHNA Appeals Procedures Section G)

The hearing(s) shall be conducted to provide applicants and jurisdictions that did not file appeals but are the subject of an appeal, with the opportunity to make their case regarding a change in their draft regional housing need allocation or another 7 jurisdiction's allocation, with the burden on the applicants to prove their case. The appeals hearings will be organized by the specific jurisdiction subject to an appeal or appeals and will adhere to the following procedures:

#### 1. Initial Arguments

Applicants who have filed an appeal for a particular jurisdiction will have an opportunity to present their request and reasons to grant the appeal. In the event of multiple appeals filed for a single jurisdiction, the subject jurisdiction will present their argument first if it has filed an appeal on its own draft RHNA allocation. Applicants may present their case either on their own, or in coordination with other applicants, but each applicant shall be allotted five (5) minutes each. If the subject jurisdiction did not file an appeal on its own draft RHNA allocation, it will be given an opportunity to present after all applicants have provided initial arguments on their filed appeals. Any presentation from the jurisdiction who did not appeal but is the subject of the appeal is limited to five (5) minutes unless it is responding to more than one appeal, in which case the jurisdiction is limited to eight (8) minutes.

#### 2. Staff Response

After initial arguments are presented, SCAG staff will present their recommendation to approve or deny the appeals filed for the subject jurisdiction. The staff response is limited to five (5) minutes.

#### 3. Rebuttal

Applicants and the jurisdiction who did not file an appeal but is the subject of the appeal may elect to provide a rebuttal but are limited to the arguments and evidence presented in the staff response. Each applicant and the subject jurisdiction that did not file an appeal on its own draft RHNA allocation will be allotted three (3) minutes each for a rebuttal.

#### 4. Extension of Time Allotment

The Chair of the Appeals Board may elect to grant additional time for any presentation, staff response, or rebuttal in the interest of due process and equity.

#### 5. Appeal Board Discussion and Determination



After arguments and rebuttals are presented, the RHNA Appeals Board may ask questions of applicants, the subject jurisdiction (if present), and SCAG staff. The Chair of the Appeals Board may request that questions from the Appeals Board be asked prior to a discussion among Appeals Board members. Any voting Board member may make a motion regarding the appeal(s) for the subject jurisdiction.

The Appeals Board is encouraged to make a single determination on the subject jurisdiction after hearing all arguments and presentations on each subject jurisdiction. The RHNA Appeals Board need not adhere to formal evidentiary rules and procedures in conducting the hearing. An appealing jurisdiction may choose to have technical staff present its case at the hearing. At a minimum, technical staff should be available at the hearing to answer any questions of the RHNA Appeals Board.



Written Comments Received on the 6th Cycle RHNA (as of 12/30/20)

| Date of Letter | Organization                                 | Name   | Topic(s)   |
|----------------|--|--|--|
| 10/11/2018     | City of Beverly Hills                        | Hon. John Mirisch                            | Subcommittee membership  |
| 12/2/2018      | City of Mission Viejo                        | Gail Shiomoto-Lohr                           | Subcommittee charter, subregional delegation, growth forecast                                    |
| 1/17/2019      | City of Beverly Hills                        | Hon. John Mirisch                            | Urban sprawl   |
| 2/4/2019       | City of Beverly Hills                        | Hon. John Mirisch                            | Role of housing supply, single family homes, subcommittee membership                             |
| 3/11/2019      | City of Beverly Hills                        | Hon. John Mirisch                            | Subcommittee membership, upzoning, single family homes   |
| 3/30/2019      | City of Beverly Hills                        | Hon. John Mirisch                            | Upzoning, urbanism, density  |
| 5/2/2019       | Central Cities Association of Los Angeles    | Jessica Lall                                 | Regional Determination   |
| 5/6/2019       | City of Irvine                               | Marika Poynter                               | Regional determination, existing need distribution, social equity adjustment                     |
| 5/20/2019      | City of Redondo Beach                        | Sean Scully                                  | Existing housing need and zoning   |
| 5/23/2019      | UCLA Luskin School of Public Affairs         | Paavo Monkkonen                              | Zoning, housing prices, and regulation   |
| 5/28/2019      | Orange County Council of Governments (OCCOG) | Hon. Stacy Berry                             | Regional determination consultation package  |
| 5/29/2019      | City of Anaheim                              | Chris Zapata                                 | Regional determination consultation package  |
| 5/31/2019      | City of Yorba Linda                          | David Brantley                               | Regional determination consultation package  |
| 6/1/2019       | City of Mission Viejo                        |  | Regional determination consultation package; distribution methodology                            |
| 6/3/2019       | City of Newport Beach                        | Seimone Jurjis                               | Regional determination consultation package  |
| 6/3/2019       | UCLA   | Paavo Monkkonen                              | Regional determination consultation package  |
| 6/4/2019       | City of Tustin                               | Elizabeth Binsack                            | Regional determination consultation package  |
| 6/4/2019       |  | Henry Fung                                   | Public outreach and engagement; regional determination consultation package                      |
| 6/5/2019       |  | Hunter Owens                                 | Regional determination consultation package  |
| 6/5/2019       | City of Santa Ana                            | Kristine Ridge                               | Regional determination consultation package  |
| 6/5/2019       | City of Newport Beach                        | Seimone Jurjis                               | Regional determination consultation package  |
| 6/5/2019       | City of Calabasas                            | Mayor David Shapiro                          | RHNA methodology   |
| 6/5/2019       |  | Vyki Englert                                 | Regional determination consultation package  |
| 6/5/2019       |  | Juan Lopez                                   | Regional determination consultation package  |
| 6/5/2019       |  | Louis Mirante                                | Regional determination consultation package  |
| 6/5/2019       |  | Carter Rubin                                 | Regional determination consultation package  |
| 6/6/2019       |  | Hon. Meghan Sahli-Wells, City of Culver City | Regional determination consultation package  |
| 6/5/2019       |  | Andy Freeland                                | Regional determination consultation package  |
| 6/5/2019       |  | Eve Bachrach                                 | Regional determination consultation package  |
| 6/6/2019       |  | Emily Groendyke                              | Regional determination consultation package  |
| 6/6/2019       |  | Timothy Hayes                                | Regional determination consultation package  |
| 6/6/2019       |  | Carter Moon                                  | Regional determination consultation package  |
| 6/6/2019       |  | Jesse Lerner-Kinglake                        | Regional determination consultation package  |
| 6/6/2019       |  | Alex Fisch                                   | Regional determination consultation package  |
| 6/6/2019       |  | Jed Lowenthal                                | Regional determination consultation package  |
| 6/6/2019       | City of Moorpark                             | Karen Vaughn                                 | Proposed RHNA Methodology  |
| 6/6/2019       | City of La Habra                             | Jim Gomez                                    | Regional determination package   |
| 6/6/2019       | County of Orange                             | Supervisor Donald Wagner                     | Regional determination package   |
| 6/18/2019      |  | Thomas Glaz                                  | Proposed RHNA methodology  |
| 6/18/2019      |  | Brendan Regulinski                           | Proposed RHNA methodology  |
| 6/18/2019      |  | Chris Palencia                               | Proposed RHNA methodology  |
| 6/19/2019      |  | Henry Fung                                   | Action on regional determination; proposed RHNA methodology; public hearing and outreach process |
| 6/21/2019      |  | Glenn Egelko                                 | Subcommittee member remarks  |
| 6/22/2019      |  | Donna Smith                                  | Proposed RHNA methodology  |
| 6/24/2019      |  | Fred Zimmerman                               | Regional determination package   |
| 6/24/2019      |  | Antoine Wakim                                | Regional determination package   |
| 6/24/2019      |  | Darrell Clarke                               | Regional determination package   |
| 6/24/2019      |  | Marcos Rodriguez Maciel                      | Regional determination package   |

Written Comments Received on the 6th Cycle RHNA (as of 12/30/20)

| Date of Letter | Organization | Name                  | Topic(s)                       |
|----------------|--------------|-----------------------|--------------------------------|
| 6/24/2019      |              | Taylor Hallam         | Regional determination package |
| 6/24/2019      |              | Phil Lord             | Regional determination package |
| 6/24/2019      |              | Edwin Woll            | Regional determination package |
| 6/24/2019      |              | Steven Guerry         | Regional determination package |
| 6/24/2019      |              | Prabhu Reddy          | Regional determination package |
| 6/24/2019      |              | Judd Schoenholtz      | Regional determination package |
| 6/24/2019      |              | Bret Contreras        | Regional determination package |
| 6/24/2019      |              | Mark Montiel          | Regional determination package |
| 6/24/2019      |              | Hardy Wronske         | Regional determination package |
| 6/24/2019      |              | William Wright        | Regional determination package |
| 6/24/2019      |              | Nicholas Burns III    | Regional determination package |
| 6/24/2019      |              | Brendan Regulinski    | Regional determination package |
| 6/24/2019      |              | Gabe Rose             | Regional determination package |
| 6/24/2019      |              | Sean McKenna          | Regional determination package |
| 6/24/2019      |              | Lolita Nurmamade      | Regional determination package |
| 6/24/2019      |              | Paul Moorman          | Regional determination package |
| 6/24/2019      |              | Ryan Welch            | Regional determination package |
| 6/24/2019      |              | Gerald Lam            | Regional determination package |
| 6/24/2019      |              | Carol Gordon          | Regional determination package |
| 6/24/2019      |              | Anthony Dedousis      | Regional determination package |
| 6/24/2019      |              | Christopher Cooper    | Regional determination package |
| 6/24/2019      |              | Colin Frederick       | Regional determination package |
| 6/24/2019      |              | Joe Goldman           | Regional determination package |
| 6/24/2019      |              | David Douglass-Jaimes | Regional determination package |
| 6/24/2019      |              | Liz Barillas          | Regional determination package |
| 6/24/2019      |              | Andy Freeland         | Regional determination package |
| 6/24/2019      |              | Grayson Peters        | Regional determination package |
| 6/24/2019      |              | Andrew Oliver         | Regional determination package |
| 6/24/2019      |              | Kyle Jenkins          | Regional determination package |
| 6/24/2019      |              | Matthew Ruscigno      | Regional determination package |
| 6/24/2019      |              | Amar Billoo           | Regional determination package |
| 6/24/2019      |              | Joshua Blumenkopf     | Regional determination package |
| 6/24/2019      |              | Leonora Camner        | Regional determination package |
| 6/24/2019      |              | Ryan Tanaka           | Regional determination package |
| 6/24/2019      |              | Partho Kalyani        | Regional determination package |
| 6/24/2019      |              | Victoria Englert      | Regional determination package |
| 6/24/2019      |              | Josh Albrektson       | Regional determination package |
| 6/24/2019      |              | Matt Stauffer         | Regional determination package |
| 6/24/2019      |              | Brooks Dunn           | Regional determination package |
| 6/24/2019      |              | Nancy Barba           | Regional determination package |
| 6/24/2019      |              | Sandra Madera         | Regional determination package |
| 6/25/2019      |              | Gregory Dina          | Regional determination package |
| 6/25/2019      |              | Brent Gaisford        | Regional determination package |
| 6/25/2019      |              | Andrew Kerr           | Regional determination package |
| 6/25/2019      |              | Hunter Owens          | Regional determination package |
| 6/25/2019      |              | Alexander Murray      | Regional determination package |
| 6/25/2019      |              | Eric Hayes            | Regional determination package |
| 6/25/2019      |              | Brent Stoll           | Regional determination package |
| 6/25/2019      |              | Matthew Dixon         | Regional determination package |
| 6/25/2019      |              | Mark Yetter           | Regional determination package |

Written Comments Received on the 6th Cycle RHNA (as of 12/30/20)

| Date of Letter | Organization                                   | Name                      | Topic(s)  |
|----------------|--|---------------------------|---|
| 6/25/2019      |  | Chase Engelhardt          | Regional determination package                            |
| 6/25/2019      |  | Hugh Martinez             | Regional determination package                            |
| 6/25/2019      |  | Christopher Palencia      | Regional determination package                            |
| 6/25/2019      |  | Nathan Pope               | Regional determination package                            |
| 6/25/2019      |  | Lauren Borchart           | Regional determination package                            |
| 6/25/2019      |  | Shane Phillips            | Regional determination package                            |
| 6/25/2019      |  | Alexander Naylor          | Regional determination package                            |
| 6/25/2019      |  | Andy May                  | Regional determination package                            |
| 6/25/2019      |  | Jon Dearing               | Regional determination package                            |
| 6/25/2019      |  | David Barboza             | Regional determination package                            |
| 6/26/2019      |  | Sofia Tablada             | Regional determination package                            |
| 6/26/2019      |  | Amanda Wilson             | Regional determination package                            |
| 6/26/2019      |  | Mike Bettinardi           | Regional determination package                            |
| 6/26/2019      |  | Emily Skehan              | Regional determination package                            |
| 6/26/2019      | City of Long Beach                             | Patrick West              | Proposed RHNA methodology                                 |
| 6/27/2019      |  | Jesse Silva               | Regional determination package                            |
| 6/27/2019      |  | Ryan Rubin                | Regional determination package                            |
| 6/27/2019      | City of Garden Grove                           | Mayor Steve Jones         | Regional determination package; proposed RHNA methodology |
| 6/27/2019      | County of Los Angeles                          | Amy Bodek                 | Proposed RHNA methodology                                 |
| 6/28/2019      |  | Maggie Rattay             | Regional determination package                            |
| 6/28/2019      |  | Brittney Hojo             | Regional determination package                            |
| 6/28/2019      |  | Thomas Irwin              | Regional determination package                            |
| 6/28/2019      |  | Steph Pavon               | Regional determination package                            |
| 7/3/2019       |  | Tyler Lindberg            | Regional determination package                            |
| 7/3/2019       |  | Ji Son                    | Regional determination package                            |
| 7/3/2019       |  | David Kitani              | Regional determination package                            |
| 7/3/2019       |  | Chase Andre               | Regional determination package                            |
| 7/3/2019       |  | Taily Pulido              | Regional determination package                            |
| 7/5/2019       |  | Stephanie Palencia        | Regional determination package                            |
| 7/6/2019       |  | Charlie Stigler           | Regional determination package                            |
| 7/8/2019       |  | Chris Rattay              | Regional determination package                            |
| 7/9/2019       |  | Holly Osborne             | Proposed RHNA Methodology                                 |
| 7/9/2019       | City of Ojai                                   | James Vega                | Proposed RHNA Methodology                                 |
| 7/10/2019      | City of South Gate                             | Joe Perez                 | Proposed RHNA Methodology                                 |
| 7/11/2019      | City of Malibu                                 | Reva Feldman              | Proposed RHNA Methodology                                 |
| 7/16/2019      | City of Los Angeles, 15 <sup>th</sup> District | Aksel Palacios            | Affordable Housing Solutions                              |
| 7/17/2019      | City of Culver City                            | Mayor Meghan Sahli-Wells  | Regional Determination                                    |
| 7/18/2019      | League of Women Voters of Los Angeles          | Sandra Trutt              | Zoning and Homelessness                                   |
| 7/18/2019      | County of Riverside                            | Juan Perez                | Proposed RHNA allocation                                  |
| 7/19/2019      | League of Women Voters of Los Angeles County   | Marge Nichols             | Regional Determination                                    |
| 7/20/2019      |  | Therese Mufic Neustaedter | Regional Determination                                    |
| 7/23/2019      | County of Ventura – Board of Supervisors       | Supervisor Steve Bennett  | Proposed RHNA Methodology                                 |
| 7/25/2019      |  | Jose Palencia             | Regional Determination                                    |
| 7/27/2019      |  | Henry Fung                | Proposed RHNA Methodology                                 |
| 7/29/2019      |  | Paavo Monkkonen           | Proposed RHNA Methodology                                 |
| 7/29/2019      |  | Paavo Monkkonen           | Proposed RHNA Methodology                                 |
| 7/29/2019      | Endangered Habitats League                     | Dan Silver                | Proposed RHNA methodology                                 |
| 7/31/2019      | League of Women Voters Los Angeles County      | Marge Nichols             | Regional Determination; Proposed RHNA Methodology         |
| 7/31/2019      | City of Beverly Hills                          | Mayor John Mirisch        | Proposed RHNA Methodology                                 |
| 7/31/2019      | City of Beverly Hills                          | Mayor John Mirisch        | Proposed RHNA Methodology                                 |

Written Comments Received on the 6th Cycle RHNA (as of 12/30/20)

| Date of Letter | Organization                        | Name                     | Topic(s)                          |
|----------------|-------------------------------------|--------------------------|-----------------------------------|
| 7/31/2019      |                                     | Assm. Richard Bloom      | Proposed RHNA Methodology         |
| 8/1/2019       | League of Women Voters Santa Monica | Natalya Zernitskaya      | Proposed RHNA Methodology         |
| 8/1/2019       | City of Malibu                      | Bonnie Blue              | Proposed RHNA Methodology; SB 182 |
| 8/1/2019       | People for Housing OC               | Elizabeth Hansburg       | Regional Determination            |
| 8/1/2019       | City of Big Bear Lake               | Jeff Matthieu            | Proposed RHNA Methodology         |
| 8/2/2019       |                                     | Donna Smith              | ?                                 |
| 8/4/2019       |                                     | Gary Drucker             | Proposed RHNA Methodology         |
| 8/5/2019       |                                     | Valerie Fontaine         | Proposed RHNA Methodology         |
| 8/5/2019       |                                     | Jay Ross                 | Proposed RHNA Methodology         |
| 8/7/2019       |                                     | Miriam Cantor            | Proposed RHNA Methodology         |
| 8/8/2019       |                                     | Jonathan Baty            | Population growth                 |
| 8/12/2019      |                                     | City of Yucaipa          | Proposed RHNA methodology         |
| 8/12/2019      |                                     | Paul Lundquist           | ?                                 |
| 8/12/2019      |                                     | Leonora Camner           | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Ryan Tanaka              | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Jesse Silva              | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Joshua Gray-Emmer        | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Chase Engelhardt         | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Drew Heckathorn          | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Liz Barillas             | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Jonah Bliss              | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Angus Beverly            | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Gregory Dina             | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Eduardo Mendoza          | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Carol Gordon             | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Joanne Leavitt           | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Mark Yetter              | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Meredith Jung            | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Nicholas Burns III       | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Judd Scoenholtz          | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Lee Benson               | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Kate Poisson             | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Joshua Blumenkopf        | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Anthony Dedousis         | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Christopher Tausanovitch | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Emerson Dameron          | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Grayson Peters           | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Tami Kagan-Abrams        | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Lauren Borchard          | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Alec Mitchell            | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Andy Freeland            | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Michelle Castelletto     | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Brent Gaisford           | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Rebecca Muli             | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Ryan Welch               | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Prabhu Reddy             | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Matthew Dixon            | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | Richard Hofmeister       | Proposed RHNA Methodology         |
| 8/12/2019      |                                     | David Barboza            | Proposed RHNA Methodology         |

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| Date of Letter | Organization                                 | Name  | Topic(s)                                  |
|----------------|--|---|---|
| 8/12/2019      |  | Michael Drowsky   | Proposed RHNA Methodology                 |
| 8/12/2019      |  | Allison Wong  | Proposed RHNA Methodology                 |
| 8/13/2019      |  | Justin Jones  | Proposed RHNA Methodology                 |
| 8/13/2019      |  | Yurhe Lim   | Proposed RHNA Methodology                 |
| 8/13/2019      |  | Ryan Koyanagi   | Proposed RHNA Methodology                 |
| 8/13/2019      |  | William Wright  | Proposed RHNA Methodology                 |
| 8/13/2019      |  | Norma Guzman  | Proposed RHNA Methodology                 |
| 8/13/2019      |  | Mary Vaiden   | Proposed RHNA Methodology                 |
| 8/13/2019      |  | Andy May  | Proposed RHNA Methodology                 |
| 8/13/2019      |  | Gerald Lam  | Proposed RHNA Methodology                 |
| 8/13/2019      |  | Kelly Koldus  | Proposed RHNA Methodology                 |
| 8/13/2019      |  | Thomas Irwin  | Proposed RHNA Methodology                 |
| 8/14/2019      |  | Susan Decker  | Proposed RHNA Methodology                 |
| 8/14/2019      |  | Michael Busse   | Proposed RHNA Methodology                 |
| 8/14/2019      |  | Rosa Flores   | Proposed RHNA Methodology                 |
| 8/14/2019      |  | Pedro Juarez  | Proposed RHNA Methodology                 |
| 8/14/2019      |  | Zennon Ulyate-Crow  | Proposed RHNA Methodology                 |
| 8/16/2019      |  | Ron Javorsky  |   |
| 8/16/2019      | County of Riverside                          | Robert Flores   | RHNA Public Outreach                      |
| 8/17/2019      |  | Marianne Buchanan   |   |
| 8/17/2019      |  | Carolyn Byrnes  | Other                                     |
| 8/17/2019      |  | Sharon Wilkins  |   |
| 8/17/2019      |  | Natalya Zernitskaya   | Proposed RHNA Methodology                 |
| 8/19/2019      |  | Kawauna Reed  |   |
| 8/19/2019      |  | Hon. Manuel Chavez (Costa Mesa Councilmember, District 4)               | Proposed RHNA Methodology                 |
|                |  | Cassius Rutherford (Parks Commissioner, Costa Mesa)                     |   |
|                |  | Chris Gaarder (Planning Commission Chair, Fullerton)                    |   |
|                |  | Brandon Whalen-Castellanos (Transportation Commission Chair, Fullerton) |   |
|                |  | Luis Aleman (Parks Commission, Santa Ana)                               |   |
| 8/19/2019      |  | Theopilis Hester  | Proposed RHNA Methodology                 |
| 8/20/2019      | City of Santa Monica                         | Rick Cole   | Proposed RHNA Methodology                 |
| 8/20/2019      | City of Rancho Palos Verdes                  | Octavio Silva   | Proposed RHNA Methodology                 |
| 8/20/2019      | City of Yorba Linda                          | Mayor Tara Campbell   | Proposed RHNA Methodology                 |
| 8/22/2019      | City of Redondo Beach                        | Mayor William Brand   | Proposed RHNA Methodology                 |
| 8/22/2019      | Orange County Council of Governments (OCCOG) | Marnie O. Primmer   | Proposed RHNA Methodology                 |
| 8/23/2019      |  | Bruce Szekes  | Public Outreach                           |
| 8/23/2019      | Center for Demographic Research              |   | Proposed RHNA Methodology                 |
| 8/23/2019      |  | Laura Smith   | Housing Distribution                      |
| 8/23/2019      | City of Beverly Hills                        | Mayor John Mirisch  | Proposed RHNA Methodology                 |
| 8/24/2019      |  | Sharon Commins  | Proposed RHNA Methodology                 |
| 8/26/2019      | City of El Segundo                           |   | Proposed RHNA Methodology                 |
| 8/26/2019      |  | Sean McKenna  | Proposed RHNA Methodology                 |
| 8/26/2019      |  | Mark Chenevey   | Proposed RHNA Methodology                 |
| 8/26/2019      |  | Derek Ryder   | Proposed RHNA Methodology                 |
| 8/26/2019      | City of Long Beach                           | Patrick West  | Proposed RHNA Methodology                 |
| 8/27/2019      | City of Mission Viejo                        | Elaine Lister   | Proposed RHNA Methodology data correction |
| 8/27/2019      |  | Shawn Danino  | Proposed RHNA Methodology                 |
| 8/27/2019      |  | Jeffery Alvarez   | Proposed RHNA Methodology                 |
| 8/27/2019      |  | Claudia Vu  | Proposed RHNA Methodology                 |
| 8/27/2019      |  | Laila Delgado   | Proposed RHNA Methodology                 |

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|----------------|----------------------------|-----------------------------------|---------------------------|
| 8/27/2019      |                            | Madeline Swim                     | Proposed RHNA Methodology |
| 8/27/2019      |                            | Nicholas Paganini                 | Proposed RHNA Methodology |
| 8/27/2019      |                            | David Aldama                      | Proposed RHNA Methodology |
| 8/27/2019      |                            | Hannah Winnie                     | Proposed RHNA Methodology |
| 8/27/2019      |                            | Akif Khan                         | Proposed RHNA Methodology |
| 8/27/2019      |                            | Gianna Lum                        | Proposed RHNA Methodology |
| 8/27/2019      |                            | Bradley Ewing                     | Proposed RHNA Methodology |
| 8/27/2019      |                            | Anne Martin                       | Proposed RHNA Methodology |
| 8/27/2019      |                            | Mysten Walker                     | Proposed RHNA Methodology |
| 8/27/2019      |                            | Verity Freebern                   | Proposed RHNA Methodology |
| 8/27/2019      |                            | Ryan Oillataguerre                | Proposed RHNA Methodology |
| 8/27/2019      |                            | Emma Desopo                       | Proposed RHNA Methodology |
| 8/27/2019      |                            | Elyssa Medina                     | Proposed RHNA Methodology |
| 8/27/2019      |                            | Judith Trujillo                   | Proposed RHNA Methodology |
| 8/27/2019      |                            | Kenia Agaton                      | Proposed RHNA Methodology |
| 8/27/2019      | OC Business Council        | Alicia Berhow                     | Proposed RHNA Methodology |
| 8/27/2019      | Palms Neighborhood Council | Eryn Block                        | Proposed RHNA Methodology |
| 8/27/2019      | County of Riverside        | Juan Perez                        | Proposed RHNA Methodology |
| 8/28/2019      |                            | Sophia Parmisano                  | Proposed RHNA Methodology |
| 8/28/2019      |                            | Anthony Castelletto               | Proposed RHNA Methodology |
| 8/28/2019      |                            | Minh Le                           | Proposed RHNA Methodology |
| 8/28/2019      |                            | Carol Luong                       | Proposed RHNA Methodology |
| 8/28/2019      |                            | Chitra Patel                      | Proposed RHNA Methodology |
| 8/28/2019      |                            | Misha Ponnuraju                   | Proposed RHNA Methodology |
| 8/27/2019      |                            | Griffin McDaniel                  | Proposed RHNA Methodology |
| 8/28/2019      |                            | Lauren Walker                     | Proposed RHNA Methodology |
| 8/28/2019      |                            | Robert Flores                     | Proposed RHNA Methodology |
| 8/28/2019      |                            | Hailey Maxwell                    | Proposed RHNA Methodology |
| 8/28/2019      |                            | Carey Kayser                      | Proposed RHNA Methodology |
| 8/28/2019      |                            | Annie Bickerton                   | Proposed RHNA Methodology |
| 8/29/2019      | City of Fullerton          | Matt Foulkes                      | Proposed RHNA Methodology |
| 8/29/2019      | City of Norco              | Steve King                        | Proposed RHNA Methodology |
| 8/29/2019      | City of Signal Hill        | Mayor Lori Wood                   | Proposed RHNA Methodology |
| 8/29/2019      | SCANPH                     | Francisco Martinez                | Proposed RHNA Methodology |
| 8/29/2019      |                            | Ross Heckmann                     | Proposed RHNA Methodology |
| 8/30/2019      |                            | Dottie Alexanian                  | Proposed RHNA Methodology |
| 8/30/2019      |                            | Judith Deutsch                    | Proposed RHNA Methodology |
| 8/30/2019      | City of Tustin             | Elizabeth Binsack                 | Proposed RHNA Methodology |
| 8/30/2019      | City of Menifee            | Cheryl Kitzerow                   | Proposed RHNA Methodology |
| 8/31/2019      |                            | Paavo Monkkonen                   | Proposed RHNA Methodology |
| 8/31/2019      |                            | Paavo Monkkonen and 27 professors | Proposed RHNA Methodology |
| 8/31/2019      |                            | Ryan Kelly                        | Proposed RHNA Methodology |
| 8/31/2019      |                            | Hydee Feldstein                   | Proposed RHNA Methodology |
| 8/31/2019      |                            | Alex Ivina                        | Proposed RHNA Methodology |
| 8/31/2019      |                            | Steve Rogers                      | Proposed RHNA Methodology |
| 8/31/2019      |                            | Phil Davis                        | Proposed RHNA Methodology |
| 8/31/2019      |                            | Kathy Hersh                       | Proposed RHNA Methodology |
| 9/1/2019       |                            | Jane Demian                       | Proposed RHNA Methodology |
| 9/1/2019       |                            | Diana Stiller                     | Proposed RHNA Methodology |
| 9/1/2019       |                            | Paula Bourges                     | Proposed RHNA Methodology |

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|----------------|--------------------------------|---------------------------|---------------------------|
| 9/1/2019       |                                | Raymond Goldstone         | Proposed RHNA Methodology |
| 9/1/2019       |                                | Christopher Palencia      | Proposed RHNA Methodology |
| 9/2/2019       |                                | Doris Roach               | Proposed RHNA Methodology |
| 9/3/2019       |                                | Judy Saunders             | Proposed RHNA Methodology |
| 9/3/2019       |                                | Susan Ashbrook            | Proposed RHNA Methodology |
| 9/3/2019       |                                | Marcelo & Irene Olavarria | Proposed RHNA Methodology |
| 9/3/2019       |                                | Margret Healy             | Proposed RHNA Methodology |
| 9/3/2019       |                                | Genie Saffren             | Proposed RHNA Methodology |
| 9/3/2019       | City of Rancho Santa Margarita | Cheryl Kuta               | Proposed RHNA Methodology |
| 9/3/2019       | City of Corona                 | Joanne Coletta            | Proposed RHNA Methodology |
| 9/3/2019       | City of Desert Hot Springs     | Rebecca Deming            | Proposed RHNA Methodology |
| 9/3/2019       |                                | Karen Boyarsky            | Regional Determination    |
| 9/3/2019       |                                | Nancee L.                 | Proposed RHNA Methodology |
| 9/3/2019       |                                | Tracy St. Claire          | Regional Determination    |
| 9/4/2019       |                                | Shelly Carlo              | Housing Distribution      |
| 9/4/2019       |                                | Bill Zimmerman            | Proposed RHNA Methodology |
| 9/4/2019       |                                | Mark Vallianatos          | Proposed RHNA Methodology |
| 9/4/2019       |                                | Marilyn Frost             | Housing Distribution      |
| 9/4/2019       |                                | Matthew Stevens           | Proposed RHNA Methodology |
| 9/4/2019       |                                | Georgianne Cowan          | Regional Determination    |
| 9/4/2019       |                                | Lisa Schecter             | Regional Determination    |
| 9/4/2019       |                                | Carol Watkins             | Regional Determination    |
| 9/4/2019       |                                | Mark Robbins              | Regional Determination    |
| 9/4/2019       |                                | Susan Horn                | Regional Determination    |
| 9/4/2019       |                                | Barbara Broide            | Regional Determination    |
| 9/4/2019       |                                | Joseph Sherwood           | Regional Determination    |
| 9/4/2019       |                                | Linda Sherwood            | Regional Determination    |
| 9/4/2019       |                                | Darren Swimmer            | Regional Determination    |
| 9/4/2019       |                                | Lee Zeldin                | Regional Determination    |
| 9/4/2019       |                                | Nancy Rae Stone           | Regional Determination    |
| 9/4/2019       |                                | Rachael Gordon            | Regional Determination    |
| 9/4/2019       |                                | Martha Singer             | Regional Determination    |
| 9/4/2019       |                                | Laurie Balustein          | Regional Determination    |
| 9/4/2019       |                                | Henry Fung                | Regional Determination    |
| 9/4/2019       |                                | Brad Pennington           | Regional Determination    |
| 9/4/2019       |                                | Mike Javadi               | Regional Determination    |
| 9/4/2019       |                                | Lauren Thomas             | Regional Determination    |
| 9/4/2019       |                                | Keith Solomon             | Regional Determination    |
| 9/4/2019       |                                | Linda Blank               | Regional Determination    |
| 9/4/2019       |                                | Valerie Brucker           | Regional Determination    |
| 9/4/2019       |                                | Craig Rich                | Regional Determination    |
| 9/4/2019       |                                | Wansun Song               | Regional Determination    |
| 9/4/2019       |                                | Robert Seligman           | Regional Determination    |
| 9/4/2019       | City of Newport Beach          | Seimone Jurjis            | Regional Determination    |
| 9/4/2019       | City of Calabasas              | Mayor David Shapiro       | Regional Determination    |
| 9/4/2019       |                                | Paul Soroudi              | Regional Determination    |
| 9/4/2019       |                                | Terrence Gomes            | Regional Determination    |
| 9/4/2019       |                                | Kimberly Fox              | Regional Determination    |
| 9/4/2019       |                                | Mra Tun                   | Regional Determination    |
| 9/4/2019       |                                | Laura Levine Lacter       | Regional Determination    |

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| Date of Letter | Organization                                  | Name                     | Topic(s)                  |
|----------------|---|--------------------------|---------------------------|
| 9/4/2019       |   | Stephen Resnick          | Regional Determination    |
| 9/4/2019       |   | Kimberly Christensen     | Regional Determination    |
| 9/4/2019       |   | Rita Villa               | Regional Determination    |
| 9/4/2019       | City of San Clemente                          | James Makshanoff         | Proposed RHNA Methodology |
| 9/4/2019       | City of Beaumont                              | Julio Martinez           | Proposed RHNA Methodology |
| 9/4/2019       | City of Hawthorne                             | Arnold Shadbehr          | Proposed RHNA Methodology |
| 9/5/2019       | City of Murrieta                              | Mayor Kelly Seyarto      | Proposed RHNA Methodology |
| 9/5/2019       | City of Canyon Lake                           | Jim Morrissey            | Proposed RHNA Methodology |
| 9/5/2019       |   | Hunter Owens             | Proposed RHNA Methodology |
| 9/5/2019       |   | Stephen Twining          | Regional Determination    |
| 9/5/2019       |   | Paul Callinan            | Regional Determination    |
| 9/5/2019       |   | C. McAlpin               | Regional Determination    |
| 9/5/2019       |   | Isabel Janken            | Regional Determination    |
| 9/5/2019       |   | Ann Hayman               | Regional Determination    |
| 9/5/2019       |   | Meg Sullivan             | Housing Production        |
| 9/5/2019       | City of Moreno Valley                         | Patty Nevins             | Proposed RHNA Methodology |
| 9/5/2019       |   | Massy Mortazavi          | Regional Determination    |
| 9/5/2019       |   | Fred Golan               | Regional Determination    |
| 9/5/2019       |   | Debbie & Howard Nussbaum | Regional Determination    |
| 9/5/2019       |   | Devony Hastings          | Regional Determination    |
| 9/5/2019       | League of Women Voters of Los Angeles County  | Marge Nichols            | RHNA Methodology          |
| 9/5/2019       |   | Larry Blugrind           | Housing Distribution      |
| 9/5/2019       |   | Terry Tegnazian          | Regional Determination    |
| 9/5/2019       | Gateway Cities Council of Governments (GCCOG) | M. Diane DuBois          | RHNA Methodology          |
| 9/5/2019       |   | Denson Fujikawa          | Other                     |
| 9/5/2019       |   | Tracy Fitzgerald         | Regional Determination    |
| 9/5/2019       | City of Pomona                                | Anita Gutierrez          | Proposed RHNA Methodology |
| 9/5/2019       |   | Minhlinh Nguyen          | Regional Determination    |
| 9/5/2019       |   | Anita Gutierrez          | Proposed RHNA Methodology |
| 9/5/2019       | City of Fountain Valley                       | Steve Nagel              | Proposed RHNA Methodology |
| 9/5/2019       | City of Camarillo                             | Kevin Kildee             | Proposed RHNA Methodology |
| 9/5/2019       |   | Denson Fujikawa          | Other                     |
| 9/6/2019       | City of Sierra Madre                          | Gabriel Engeland         | Proposed RHNA Methodology |
| 9/6/2019       | City of Laguna Hills                          | Donald White             | Proposed RHNA Methodology |
| 9/6/2019       |   | David Oliver             | Regional Determination    |
| 9/6/2019       | City of Chino Hills                           | Joann Lombardo           | Proposed RHNA Methodology |
| 9/7/2019       |   | David Ting               | Regional Determination    |
| 9/9/2019       | City of Azusa                                 | Sergio Gonzalez          | Proposed RHNA Methodology |
| 9/9/2019       | City of Alhambra                              | Jessica Binnquist        | Proposed RHNA Methodology |
| 9/9/2019       | Los Angeles Chamber of Commerce               | Maria Salinas            | RHNA Methodology          |
| 9/9/2019       | City of Ranchos Palos Verdes                  | Octavio Silva            | Proposed RHNA Methodology |
| 9/9/2019       |   | Kathy Whooley            | Regional Determination    |
|                | San Gabriel Valley Council of Governments     |                          |                           |
| 9/9/2019       | (SGVCOG)                                      | Cynthia Sternquist       | Proposed RHNA Methodology |
| 9/9/2019       |   | Matthew Hinsley          | Regional Determination    |
| 9/9/2019       | City of Agoura Hills                          | Greg Ramirez             | Proposed RHNA Methodology |
| 9/10/2019      | City of Redondo Beach                         | Laura Emdee              | Regional Determination    |
| 9/10/2019      |   | Jessica Sandoval         | Proposed RHNA Methodology |
| 9/10/2019      | City of Redondo Beach                         | Bill Brand               | Proposed RHNA Methodology |
| 9/10/2019      |   | Yesenia Medina           | Regional Determination    |



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| 9/10/2019      |   | Jeannette Mazul         | Regional Determination    |
| 9/10/2019      |   | Jocelyne Irineo         | Proposed RHNA Methodology |
| 9/10/2019      |   | Cristina Resendez       | Proposed RHNA Methodology |
| 9/10/2019      |   | Carla Bucio             | Proposed RHNA Methodology |
| 9/10/2019      | City of Redondo Beach                   | Bill Brand              | Proposed RHNA Methodology |
| 9/10/2019      | City of Redondo Beach                   | Laura Emdee             | Proposed RHNA Methodology |
| 9/10/2019      | City of Garden Grove                    | Steve Jones             | Proposed RHNA Methodology |
| 9/10/2019      |   | Henry Fung              | Overall RHNA Process      |
| 9/10/2019      | City of San Marino                      | Aldo Cervantes          | Proposed RHNA Methodology |
| 9/10/2019      | City of South Gate                      | Jorge Morales           | Proposed RHNA Methodology |
| 9/10/2019      | City of Torrance                        | Patrick Furey           | Proposed RHNA Methodology |
| 9/10/2019      | City of Rancho Cucamonga                | John Gillison           | Proposed RHNA Methodology |
| 9/10/2019      |   | Jeannette Mazul         | Affordable Housing        |
| 9/10/2019      |   | Tina Kim                | Proposed RHNA Methodology |
| 9/11/2019      | City of South Pasadena                  | Stephanie DeWolfe       | Proposed RHNA Methodology |
| 9/11/2019      | City of Glendora                        | Jeff Kugel              | Proposed RHNA Methodology |
| 9/11/2019      | City of Ojai                            | John F. Johnson         | Proposed RHNA Methodology |
| 9/11/2019      | City of Oxnard                          | Tim Flynn               | Proposed RHNA Methodology |
| 9/11/2019      | City of Westlake Village                | Ned E. Davis            | Proposed RHNA Methodology |
| 9/11/2019      | City of Cerritos                        | Art Gallucci            | Proposed RHNA Methodology |
| 9/11/2019      | City of Hemet                           | Christopher Lopez       | Proposed RHNA Methodology |
| 9/11/2019      | City of La Palma                        | Laurie Murray           | Proposed RHNA Methodology |
| 9/11/2019      | City of Bell                            | Ali Saleh               | Proposed RHNA Methodology |
| 9/11/2019      |   | Karen Rivera            | Regional Determination    |
| 9/11/2019      |   | David Coffin            | Regional Determination    |
| 9/12/2019      | City of Lomita                          | Alicia Velasco          | Proposed RHNA Methodology |
| 9/12/2019      | City of Wildomar                        | Matthew Bassi           | Proposed RHNA Methodology |
| 9/12/2019      | City of Aliso Viejo                     | David Doyle             | Proposed RHNA Methodology |
| 9/12/2019      | City of Commerce                        | Vilko Domic             | Proposed RHNA Methodology |
| 9/12/2019      | City of El Monte                        | Betty Donavanik         | Proposed RHNA Methodology |
|                | South Bay Cities Council of Governments |                         |                           |
| 9/12/2019      | (SBCCOG)                                | Christian Horvath       | Proposed RHNA Methodology |
| 9/12/2019      | City of Huntington Beach                | Dave Kiff               | Proposed RHNA Methodology |
| 9/12/2019      | City of Rosemead                        | Gloria Molleda          | Proposed RHNA Methodology |
| 9/12/2019      | City of Dana Point                      | Matt Schneider          | Proposed RHNA Methodology |
| 9/12/2019      | City of Placentia                       | Rhonda Shader           | Proposed RHNA Methodology |
| 9/12/2019      | City of Palos Verdes Estates            | Carolynn Petru          | Proposed RHNA Methodology |
| 9/12/2019      | City of Palmdale                        | Mark Oyler              | Proposed RHNA Methodology |
| 9/12/2019      | City of Hawthorne                       | Alejandro Vargas        | Proposed RHNA Methodology |
| 9/12/2019      | City of Irvine                          | Mayor Christina L. Shea | Proposed RHNA Methodology |
| 9/12/2019      | City of Walnut                          | Rob Wishner             | Proposed RHNA Methodology |
| 9/12/2019      | City of Maywood                         | Jennifer Vasquez        | Proposed RHNA Methodology |
| 9/12/2019      | City of Culver City                     | Meghan Sahli-Wells      | Proposed RHNA Methodology |
| 9/12/2019      | City of Buena Park                      | Joel Rosen              | Proposed RHNA Methodology |
| 9/12/2019      | City of Santa Clarita                   | Thomas Cole             | Proposed RHNA Methodology |
| 9/12/2019      | City of Temecula                        | Luke Watson             | Proposed RHNA Methodology |
| 9/12/2019      | City of Lake Elsinore                   | Richard MacHott         | Proposed RHNA Methodology |
| 9/12/2019      | City of San Dimas                       | Ken Duran               | Proposed RHNA Methodology |
| 9/12/2019      | City of Irwindale                       | William Tam             | Proposed RHNA Methodology |
| 9/12/2019      | City of Santa Ana                       | Kristine Ridge          | Proposed RHNA Methodology |

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| 9/12/2019   | City of La Mirada                              | Jeff Boynton                    | Proposed RHNA Methodology |
| 9/12/2019   | City of Anaheim                                | Chris Zapata                    | Proposed RHNA Methodology |
| 9/12/2019   | City of Costa Mesa                             | Lori Ann Farrell Harrison       | Proposed RHNA Methodology |
| 9/12/2019   | City of Huntington Park                        | Sergio Infanzon                 | Proposed RHNA Methodology |
| 9/12/2019   | Westside Neighborhood Council                  | Terri Tippit                    | Proposed RHNA Methodology |
| 9/12/2019   | City of Eastvale                               | Bryan Jones                     | Proposed RHNA Methodology |
| 9/12/2019   |  | John Birkett                    | Regional Determination    |
| 9/12/2019   |  | Lourdes Petersen                | Regional Determination    |
| 9/12/2019   |  | Jesse Silva                     | Proposed RHNA Methodology |
| 9/12/2019   |  | Anne Hilborn                    | Proposed RHNA Methodology |
| 9/12/2019   |  | Henry Fung                      | Proposed RHNA Methodology |
| 9/13/2019   |  | Holly Osborne                   | Proposed RHNA Methodology |
| 9/13/2019   |  | Niall Huffman                   | Proposed RHNA Methodology |
| 9/13/2019   |  | Michael Hoskinson               | Proposed RHNA Methodology |
| San Bernardino County Transportation                |  |                                 |                           |
| 9/13/2019   | Authority/Council of Governments (SBCTA/SBCOG) | Darcy McNaboe                   | Proposed RHNA Methodology |
| 9/13/2019   | City of Downey                                 | Aldo Schindler                  | Proposed RHNA Methodology |
| 9/13/2019   | City of Bellflower                             | Elizabeth Corpuz                | Proposed RHNA Methodology |
| 9/13/2019   | City of Lakewood                               | Abel Avalos                     | Proposed RHNA Methodology |
| 9/13/2019   | City of Orange                                 | Rick Otto                       | Proposed RHNA Methodology |
| 9/13/2019   | City of Paramount                              | John Carver                     | Proposed RHNA Methodology |
| 9/13/2019   | City of Rolling Hills                          | Jeff Pieper                     | Proposed RHNA Methodology |
| 9/13/2019   | City of San Fernando                           | Nick Kimball                    | Proposed RHNA Methodology |
| 9/13/2019   | City of Mission Viejo                          | Dennis Wilberg                  | Proposed RHNA Methodology |
| 9/13/2019   | City of Moorpark                               | Karen Vaughn                    | Proposed RHNA Methodology |
| 9/13/2019   | American Planning Association (CA Chapter)     | Eric Phillips                   | Proposed RHNA Methodology |
| 9/13/2019   | County of Ventura                              | David Ward                      | Proposed RHNA Methodology |
| 9/13/2019   | City of Chino                                  | Nicholas Liguori                | Proposed RHNA Methodology |
| 9/13/2019   | One Step A La Vez                              | Kate English                    | Housing Development       |
| American Planning Association (Los Angeles Section) |  |                                 |                           |
| 9/13/2019   |  | Ryan Kurtzman                   | Proposed RHNA Methodology |
| 9/13/2019   | City of Laguna Beach                           | Scott Drapkin                   | Proposed RHNA Methodology |
| 9/13/2019   | Santa Monicans for Renters' Rights             | Patricia Hoffman and Denny Zane | Proposed RHNA Methodology |
| Western Riverside Council of Governments (WRCOG)    |  |                                 |                           |
| 9/13/2019   |  | Rick Bishop                     | Proposed RHNA Methodology |
| 9/13/2019   | City of Los Angeles                            | Mayor Eric Garcetti             | Proposed RHNA Methodology |
| 9/13/2019   | City of West Hollywood                         | Mayor John D'Amico              | Proposed RHNA Methodology |
| 9/13/2019   | City of San Juan Capistrano                    | Joel Rojas                      | Proposed RHNA Methodology |
| 9/13/2019   | City of Thousand Oaks                          | Mark Towne                      | Proposed RHNA Methodology |
| 9/13/2019   | City of Newport Beach                          | Seimone Jurjjs                  | Proposed RHNA Methodology |
| 9/13/2019   | City of Laguna Niguel                          | Jonathan Orduna                 | Proposed RHNA Methodology |
| 9/13/2019   | County of San Bernardino                       | Terri Rahhal                    | Proposed RHNA Methodology |
| 9/13/2019   | City of Indio                                  | Kevin Snyder                    | Proposed RHNA Methodology |
| 9/13/2019   | City of Avalon                                 | Anni Marshall                   | Proposed RHNA Methodology |
| 9/13/2019   | City of Burbank                                | Patrick Prescott                | Proposed RHNA Methodology |
| 9/13/2019   | City of Santa Monica Housing Commission        | Michael Soloff                  | Proposed RHNA Methodology |
| 9/13/2019   | City of Riverside                              | Jay Eastman                     | Proposed RHNA Methodology |
| 9/13/2019   | City of Whittier                               | Conal McNamara                  | Proposed RHNA Methodology |
| 9/13/2019   | City of San Gabriel                            | Arminé Chaparyan                | Proposed RHNA Methodology |

Written Comments Received on the 6th Cycle RHNA (as of 12/30/20)

| Date of Letter | Organization  | Name   | Topic(s)                  |
|----------------|---|--|---------------------------|
| 9/13/2019      | City of San Buenaventura (Ventura)  | Peter Gilli  | Proposed RHNA Methodology |
| 9/13/2019      | City of Temple City   | Scott Reimers  | Proposed RHNA Methodology |
| 9/13/2019      | City of Palm Desert   | Ryan Stendell  | Proposed RHNA Methodology |
| 9/13/2019      | City of Monterey Park   | Ron Bow  | Proposed RHNA Methodology |
| 9/13/2019      | LA Thrives Et Al. (19 total organizations)  | LA Thrives Et Al. (19 total organizations)                                       | Proposed RHNA Methodology |
| 9/13/2019      | Leadership Council for Justice and Accountability Et Al. (7 total organizations)    | Leadership Council for Justice and Accountability Et Al. (7 total organizations) | Proposed RHNA Methodology |
| 9/13/2019      | Southern California Business Coalition (7 total organizations)                      | Southern California Business Coalition (7 total organizations)                   | Proposed RHNA Methodology |
| 9/15/2019      |   | Michelle Schumacher  | Other                     |
| 9/30/2019      | Homeowners of Encino  | Eliot Cohen  | Proposed RHNA Methodology |
| 9/30/2019      |   | Trudy Sokol  | Other                     |
| 10/1/2019      | City of Barstow   | Michael Massimini  | Proposed RHNA Methodology |
| 10/2/2019      | County of Orange  | Supervisor Donald Wagner   | Draft RHNA Methodology    |
| 10/3/2019      | County of Riverside   | Charissa Leach   | Draft RHNA Methodology    |
| 10/4/2019      | City of Irvine  | Mayor Christina L. Shea  | Draft RHNA Methodology    |
| 10/6/2019      | UCLA Luskin School of Public Affairs  | Paavo Monkkonen  | Draft RHNA Methodology    |
| 10/7/2019      | City of Costa Mesa  | Lori Ann Farrell Harrison  | Draft RHNA Methodology    |
| 10/8/2019      | South Bay Cities Council of Governments (SBCCOG)                                    | Christian Horvath  | Draft RHNA Methodology    |
| 10/9/2019      | Del Rey Residents Association   | Tara Walden  | Other                     |
| 10/10/2019     |   | Karen Davis Ferlauto   | Other                     |
| 10/11/2019     | Abundant Housing LA   | David Bonaccorsi   | Draft RHNA Methodology    |
| 10/11/2019     | City of Oxnard  | Mayor Tim Flynn  | Draft RHNA Methodology    |
| 10/16/2019     | County of Riverside   | Charissa Leach   | Draft RHNA Methodology    |
| 10/21/2019     | City of Newport Beach   | Seimone Jurjis   | Draft RHNA Methodology    |
| 10/21/2019     | San Bernardino County Transportation Authority/Council of Governments (SBCTA/SBCOG) | Ray Wolfe  | Draft RHNA Methodology    |
| 10/23/2019     | County of Riverside   | Barbara Broide   | Draft RHNA Methodology    |
| 10/23/2019     |   | Supervisor Kevin Jeffries  | Draft RHNA Methodology    |
| 10/25/2019     |   | Robert Flores  | Draft RHNA Methodology    |
| 10/25/2019     |   | Reed Bernet  | Draft RHNA Methodology    |
| 10/29/2019     | Rancho Palos Verdes   | Ana Mihranian  | Draft RHNA Methodology    |
| 10/28/2019     |   | Warren Hogg  | Draft RHNA Methodology    |
| 10/29/2019     | City of Coachella   | Luis Lopez   | Draft RHNA Methodology    |
| 10/31/2019     |   | Marilyn Brown  | Purpose of RHNA           |
| 11/1/2019      |   | Mayor Rusty Bailey (City of Riverside)   |                           |
| 11/1/2019      |   | Supervisor Karen Spiegel (County of Riverside)                                   |                           |
| 11/1/2019      |   | Mayor Frank Navarro (City of Colton)   |                           |
| 11/1/2019      |   | Hon. Toni Momberger (City of Redlands)   | Draft RHNA Methodology    |
| 11/1/2019      | City of Los Angeles, 4th District   | Hon. David Ryu   | Draft RHNA Methodology    |
| 11/4/2019      | Central Cities Association of Los Angeles   | Jessica Lall   | Draft RHNA Methodology    |
| 11/5/2019      | Orange County Council of Governments (OCCOG)  | Marnie O. Primmer  | Draft RHNA Methodology    |
| 11/5/2019      | City of Gardena   | Mayor Tasha Cerda  | Draft RHNA Methodology    |
| 11/5/2019      | City of Los Angeles   | Vincent P. Bertoni and Kevin J. Keller   | Draft RHNA Methodology    |
| 11/5/2019      | City of Huntington Beach  | Oliver Chi   | Draft RHNA Methodology    |
| 11/6/2019      | City of Hemet   | Christopher Lopez  | Draft RHNA Methodology    |
| 11/6/2019      | City of Chino   | Nicholos S. Liguori  | Draft RHNA Methodology    |
| 11/6/2019      | City of Menifee   | Cheryl Kitzerow  | Draft RHNA Methodology    |

Written Comments Received on the 6th Cycle RHNA (as of 12/30/20)

| Date of Letter | Organization                                  | Name  | Topic(s)                         |
|----------------|---|---|----------------------------------|
| 11/6/2019      | County of Los Angeles                         | Sachi A. Hamai  | Draft RHNA Methodology           |
| 11/6/2019      | City of Newport Beach                         | Seimone Jurjjs  | Draft RHNA Methodology           |
| 11/6/2019      | City of Fontana                               | Michael Milhiser  | Draft RHNA Methodology           |
| 11/6/2019      | City of Chino Hills                           | Joann Lombardo  | Draft RHNA Methodology           |
| 11/6/2019      |   | Henry Fung  | Regional Determination           |
| 11/6/2019      | City of Costa Mesa                            | Barry Curtis  | Draft RHNA Methodology           |
| 11/7/2019      | City of Temple City                           | Scott Reimers   | Draft RHNA Methodology           |
| 11/8/2019      | Gateway Cities Council of Governments (GCCOG) | Nancy Pfeffer   | Draft RHNA Methodology           |
| 11/20/2019     | City of Huntington Beach                      | Michael Gates, Mayor Erik Peterson,<br>and Mayor Pro Tem Lyn Semeta | Draft RHNA Methodology           |
| 12/12/2019     |   | Holly Osborne   | Draft RHNA Methodology           |
| 12/12/2019     | City of Tustin                                | Allan Bernstein   | Draft RHNA Methodology           |
| 12/19/2019     | City of Fountain Valley                       | Mayor Cheryl Brothers   | Draft RHNA Methodology           |
| 12/16/2019     | City of Chino Hills                           | Joann Lombardo  | Draft RHNA Methodology           |
| 12/20/2019     | City of Cerritos                              | Naresh Solanki  | Draft RHNA Methodology           |
| 1/23/2020      |   | Karen Farley  | Draft RHNA Methodology           |
| 1/23/2020      |   | Steve Stowell   | Draft RHNA Methodology           |
| 1/27/2020      |   | Janet Chang   | Draft RHNA Methodology           |
| 1/29/2020      | City of Downey                                | Mayor Blanca Pacheco  | Draft RHNA Methodology           |
| 2/4/2020       | City of Cerritos                              | Mayor Naresh Solanki  | Draft RHNA Methodology           |
| 2/6/2020       |   | Steve Davey   | Draft RHNA Methodology           |
| 2/6/2020       |   | Connie Bryant   | Draft RHNA Methodology           |
| 2/6/2020       |   | Tom Wright  | Draft RHNA Methodology           |
| 2/10/2020      | City of Irvine                                | Marika Poynter  | Draft Appeals Procedures         |
| 2/10/2020      | City of Laguna Hills                          | David Chantarangsu  | Draft Appeals Procedures         |
| 2/10/2020      | City of Mission Viejo                         | Gail Shiomoto-Lohr  | Draft Appeals Procedures         |
| 2/10/2020      | City of Santa Ana                             | Melanie McCann  | Draft Appeals Procedures         |
| 2/10/2020      | City of Oxnard (amended)                      | Elyssa Vasquez  | Draft Appeals Procedures         |
| 2/10/2020      |   | Jennifer Denmark  | Draft Appeals Procedures         |
| 2/12/2020      |   | Janice and Ricardo Lim  | Draft RHNA Methodology           |
| 2/18/2020      | City of Lakewood                              | Thaddeus McCormack  | Draft RHNA Methodology           |
| 2/18/2020      | OCCOG   | Marnie O. Primmer   | Regional Determination Objection |
| 2/18/2020      |   | Nancy Norman  | Draft RHNA Methodology           |
| 2/18/2020      |   | Sepeedeh Ahadiat  | Draft RHNA Methodology           |
| 2/18/2020      |   | Nas Ahadiat   | Draft RHNA Methodology           |
| 2/19/2020      |   | Dave Latter   | Draft RHNA Methodology           |
| 2/19/2020      |   | Vikki Bujold-Peterson   | Draft RHNA Methodology           |
| 2/19/2020      | City of Yorba Linda                           | David Brantley  | Draft RHNA Methodology           |
| 2/21/2020      | City of Newport Beach                         | Will O'Neill  | Draft RHNA Methodology           |
| 2/20/2020      | City of Rancho Santa Margarita                | Cheryl Kuta   | Draft RHNA Methodology           |
| 2/20/2020      | City of Huntington Beach                      | Oliver Chi  | Draft RHNA Methodology           |
| 2/20/2020      | City of South Gate                            | Joe Perez   | Draft RHNA Methodology           |
| 2/20/2020      | City of West Hollywood                        | John Leonard  | Draft RHNA Methodology           |
| 2/20/2020      | City of Cerritos                              | Art Gallucci  | Draft RHNA Methodology           |
| 2/22/2020      |   | Colleen Johnson   | Draft RHNA Methodology           |
| 2/23/2020      |   | Nancy Pleskot   | Other                            |
| 2/23/2020      |   | Susan Decker  | Draft RHNA Methodology           |
| 2/23/2020      |   | Scott Nathan  | Housing Development              |
| 2/20/2020      | City of Irvine                                | Pete Carmichael   | Draft RHNA Methodology           |
| 2/20/2020      | City of Anaheim                               | Ted White   | Draft RHNA Methodology           |

Written Comments Received on the 6th Cycle RHNA (as of 12/30/20)

| Date of Letter | Organization                | Name   | Topic(s)                                |
|----------------|-----------------------------|--|---|
| 2/24/2020      | City of Anaheim             | Trevor O'Neil  | Draft RHNA Methodology                  |
| 2/25/2020      |                             | Vito Mancini   | Draft RHNA Methodology                  |
| 2/25/2020      |                             | Henry Fung   | CEHD Meeting Agenda                     |
| 2/25/2020      | City of Rosemead            | Margaret Clark and Gloria Molleda  | Draft RHNA Methodology                  |
| 2/26/2020      | City of Fullerton           | Kenneth Domer  | Draft RHNA Methodology                  |
| 2/26/2020      |                             | Henry Fung   | Draft RHNA Methodology                  |
| 2/26/2020      | City of Alhambra            | Jessica Binnquist  | Draft RHNA Methodology                  |
| 2/26/2020      |                             | Holly Osborne  | Draft RHNA Methodology                  |
| 2/26/2020      | City of La Mirada           | Jeff Boynton   | Draft RHNA Methodology                  |
| 2/26/2020      | City of Garden Grove        | Steven Jones   | Draft RHNA Methodology                  |
| 2/26/2020      |                             | Mehta Sunil  | Draft RHNA Methodology                  |
| 2/26/2020      | City of Gardena             | Tasha Cerda  | Draft RHNA Methodology                  |
| 2/27/2020      |                             | Jaimie Suh   | Draft RHNA Methodology                  |
| 2/27/2020      | City of South Pasadena      | Robert S. Joe  | Draft RHNA Methodology                  |
| 2/27/2020      | City of South Gate          | Michael Flad   | Draft RHNA Methodology                  |
| 2/27/2020      | City of Walnut              | Rob Wishner  | Draft RHNA Methodology                  |
| 2/27/2020      | City of La Verne            | Eric Scherer   | Draft RHNA Methodology                  |
| 2/28/2020      |                             | Kari Geosano   | Draft RHNA Methodology                  |
| 2/28/2020      | City of Torrance            | Danny E. Santana   | Draft RHNA Methodology                  |
| 2/28/2020      | City of Laguna Hills        | Janine Heft  | Draft RHNA Methodology                  |
| 3/1/2020       |                             | Scott Pisano   | Draft RHNA Methodology                  |
| 3/2/2020       | City of Bradbury            | Richard T. Hale, Jr.   | Draft RHNA Methodology                  |
| 3/2/2020       | City of La Mirada           | Jeff Boynton   | Draft RHNA Methodology                  |
| 3/2/2020       | City of Norco               | Steve King   | Draft RHNA Methodology                  |
| 3/2/2020       | City of Seal Beach          | Les Johnson  | Draft RHNA Methodology                  |
| 3/3/2020       | City of Torrance            | Danny E. Santana   | Draft RHNA Methodology                  |
| 3/3/2020       | City of Cerritos            | Art Gallucci   | Draft RHNA Methodology                  |
| 3/3/2020       | City of San Dimas           | Ken Duran  | Draft RHNA Methodology                  |
| 3/3/2020       | City of La Palma            | Peter Kim  | Draft RHNA Methodology                  |
| 3/3/2020       | City of Newport Beach       | Will O'Neill   | Draft RHNA Methodology                  |
| 3/3/2020       | City of Rancho Palos Verdes | Terry Rodrigue   | Draft RHNA Methodology                  |
| 3/4/2020       |                             | Brian Johnson  | Draft RHNA Methodology                  |
| 3/4/2020       | City of Riverside           | William R. "Rusty" Bailey (City of Riverside), Frank Navarro (City of Colton),<br>Larry K. McCallon (City of Highland), Deborah Robertson (City of Rialto),<br>Carmen Ramirez (City of Oxnard), Steve Manos (City of Lake Elsinore), Karen<br>S. Spiegel (County of Riverside) | Draft RHNA Methodology                  |
| 3/4/2020       | City of Monterey Park       | Ron Bow  | Draft RHNA Methodology                  |
| 3/4/2020       |                             | Holly Osborne  | Draft RHNA Methodology                  |
| 3/4/2020       | City of La Puente           | Bob Lindsey  | Draft RHNA Methodology                  |
| 3/4/2020       | City of Huntington Beach    | Oliver Chi   | Draft RHNA Methodology                  |
| 3/4/2020       | City of Eastvale            | Bryan Jones  | Draft RHNA Methodology                  |
| 3/4/2020       | City of Lake Forest         | Neeki Moatazed   | Draft RHNA Methodology                  |
| 3/4/2020       | City of Chino Hills         | Ray Marquez  | Draft RHNA Methodology                  |
| 3/4/2020       | City of La Puente           | Bob Lindsey  | Draft RHNA Methodology                  |
| 3/5/2020       | City of Costa Mesa          | Barry Curtis   | Draft RHNA Methodology                  |
| 3/12/2020      | City of Fountain Valley     | (unsigned)   | Proposed Housing Legislative Amendments |
| 3/14/2020      |                             | Amy Wasson   | RHNA Methodology                        |
| 4/27/2020      | OCCOG                       | Hon. Trevor O'Neil   | RHNA Methodology                        |
| 5/5/2020       |                             | Holly Osborne  | RHNA Methodology                        |
| 5/5/2020       |                             | Holly Osborne  | RHNA Methodology (2nd letter received)  |

Written Comments Received on the 6th Cycle RHNA (as of 12/30/20)

| Date of Letter | Organization   | Name                               | Topic(s)   |
|----------------|--|------------------------------------|--|
| 11/4/2020      | City of Beverly Hills  | Lester J. Friedman                 | RHNA Litigation Committee  |
| 11/9/2020      | City of Lakewood   | Todd Rogers                        | RHNA Litigation Committee  |
| 11/10/2020     | City of Rosemead   | Sandra Armenta                     | RHNA Litigation Committee  |
| 11/10/2020     | City of Gardena  | Tasha Cerda                        | RHNA Litigation Committee  |
| 11/11/2020     | City of Cypress  | Rob Johnson                        | Comment from Jurisdiction on filed appeal: City of Cypress   |
| 11/11/2020     | City of Cypress  | Rob Johnson                        | RHNA Litigation Committee  |
| 11/12/2020     | City of Torrance   | Patrick J. Furey                   | RHNA Litigation Committee  |
| 11/13/2020     | City of Whittier   | Joe Vinatieri                      | RHNA Litigation Committee  |
| 11/16/2020     | City of Rancho Santa Margarita                                   | Bradley J. McGirr                  | RHNA Litigation Committee  |
| 11/16/2020     | City of Pico Rivera  | Gustavo Camacho                    | RHNA Litigation Committee  |
| 11/16/2020     | City of Pico Rivera  | Steve Carmona                      | RHNA Litigation Committee  |
| 11/16/2020     | City of Glendora   | Michael Allawos                    | RHNA Litigation Committee  |
| 11/17/2020     | City of Beverly Hills  | George Chavez                      | RHNA Litigation Committee  |
| 11/17/2020     | City of Lawndale   | Robert Pullen-Miles                | RHNA Litigation Committee  |
| 11/17/2020     | City of Norwalk  | Jennifer Perez                     | RHNA Litigation Committee  |
| 11/17/2020     | City of Redondo Beach  | William Brand                      | RHNA Litigation Committee  |
| 11/17/2020     | City of San Fernando   | Joel Fajardo                       | RHNA Litigation Committee  |
| 11/17/2020     | City of Fountain Valley  | Cheryl Brothers                    | RHNA Litigation Committee  |
| 11/17/2020     | City of Laguna Beach   | Bob Whalen                         | RHNA Litigation Committee  |
| 11/18/2020     | City of Cerritos   | Frank Aurelio Yokoyama             | RHNA Litigation Committee  |
| 11/18/2020     | City of Rancho Palos Verdes                                      | Ara Michael Mhuranian              | RHNA Litigation Committee  |
| 11/18/2020     | City of Pasadena   | Steve Mermell                      | RHNA Litigation Committee  |
| 11/18/2020     | City of Lomita   | James Gazeley                      | RHNA Litigation Committee  |
| 11/18/2020     | City of Westminster  | Sherry Johnson                     | RHNA Litigation Committee  |
| 11/18/2020     | City of Temple City  | Bryan Cook                         | RHNA Litigation Committee  |
| 11/20/2020     | South Bay Cities Council of Governments                          | Olivia Valentine                   | RHNA Litigation Committee  |
| 11/24/2020     | City of Calipatria   | Jim Spellins                       | RHNA Litigation Committee  |
| 11/24/2020     | City of Chino  | Nicholas S. Liguori                | RHNA Litigation Committee  |
| 11/30/2020     | City of Irvine   | Christina Shea                     | RHNA Litigation Committee  |
| 11/30/2020     | City of Signal Hill  | Robert Copeland                    | RHNA Litigation Committee  |
| 12/1/2020      | City of Yorba Linda  | Mark Pulone                        | Comment from Jurisdiction on filed appeal: City of Yorba Linda                                     |
| 12/1/2020      | Orange County Mayors   | 21 Orange County mayors            | RHNA Litigation Committee  |
| 12/2/2020      | City of Rancho Santa Margarita                                   | Bradley J. McGirr                  | Comment from Jurisdiction on filed appeal: City of Rancho Santa Margarita                          |
| 12/3/2020      | City of Long Beach   | Christopher Koontz                 | Comment from Jurisdiction on filed appeal: City of Long Beach                                      |
| 12/4/2020      |  | Kevin Yang                         | Public comment on filed appeal: City of Yorba Linda  |
| 12/9/2020      | City of Yorba Linda  | Mark Pulone                        | Comment from Jurisdiction on filed appeal: City of Yorba Linda                                     |
| 12/10/2020     | City of Whittier   | Jeffrey S. Adams                   | Comment from Jurisdiction on filed appeal: City of Whittier  |
|                | California Department of Housing and Community Development (HCD) | Megan Kirkeby                      | Comment from California Department of Housing & Community Development on filed appeal: All appeals |
| 12/10/2020     | City of Corona   | Joanne Coletta                     | Comment from Jurisdiction on filed appeal: City of Corona  |
| 12/10/2020     | City of Santa Ana  | Kristine Ridge                     | Comment from Jurisdiction on filed appeal: City of Santa Ana                                       |
| 12/10/2020     | Public Law Center  | Alexis Mondares and Richard Walker | Public comment on filed appeal: Costa Mesa   |
| 12/10/2020     | Public Law Center  | Alexis Mondares and Richard Walker | Public comment on filed appeal: County of Orange   |
| 12/10/2020     | Public Law Center  | Alexis Mondares and Richard Walker | Public comment on filed appeal: Fountain Valley  |
| 12/10/2020     | Public Law Center  | Alexis Mondares and Richard Walker | Public comment on filed appeal: Fullerton  |
| 12/10/2020     | Public Law Center  | Alexis Mondares and Richard Walker | Public comment on filed appeal: Garden Grove   |
| 12/10/2020     | Public Law Center  | Alexis Mondares and Richard Walker | Public comment on filed appeal: Irvine   |
| 12/10/2020     | Public Law Center  | Alexis Mondares and Richard Walker | Public comment on filed appeal: La Palma   |
| 12/10/2020     | Public Law Center  | Alexis Mondares and Richard Walker | Public comment on filed appeal: Laguna Beach   |
| 12/10/2020     | Public Law Center  | Alexis Mondares and Richard Walker | Public comment on filed appeal: Laguna Hills   |

Written Comments Received on the 6th Cycle RHNA (as of 12/30/20)

| Date of Letter | Organization        | Name                               | Topic(s)   |
|----------------|---------------------|------------------------------------|--|
| 12/10/2020     | Public Law Center   | Alexis Mondares and Richard Walker | Public comment on filed appeal: Los Alamitos           |
| 12/10/2020     | Public Law Center   | Alexis Mondares and Richard Walker | Public comment on filed appeal: Mission Viejo          |
| 12/10/2020     | Public Law Center   | Alexis Mondares and Richard Walker | Public comment on filed appeal: Newport Beach          |
| 12/10/2020     | Public Law Center   | Alexis Mondares and Richard Walker | Public comment on filed appeal: Rancho Santa Margarita |
| 12/10/2020     | Public Law Center   | Alexis Mondares and Richard Walker | Public comment on filed appeal: Tustin                 |
| 12/10/2020     | Public Law Center   | Alexis Mondares and Richard Walker | Public comment on filed appeal: Westminster            |
| 12/10/2020     | Public Law Center   | Alexis Mondares and Richard Walker | Public comment on filed appeal: Yorba Linda            |
| 12/21/2020     | City of Yorba Linda | Mark Pulone                        | Response to comment from Public Law Center (12/10/20)  |
| 12/24/2020     |                     | Holly Osborne                      | RHNA Methodology                                       |

[All comments are posted online at https://scag.ca.gov/rhna-comments.](https://scag.ca.gov/rhna-comments)

Comments can be submitted to: [housing@scag.ca.gov](mailto:housing@scag.ca.gov)



Southern California Association of Governments  
Remote Participation Only  
January 8, 2021

**To:** Regional Housing Needs Assessment Subcommittee (RHNA)

**EXECUTIVE DIRECTOR'S  
APPROVAL**

**From:** Karen Calderon, Associate Regional Planner,  
(213) 236-1983, calderon@scag.ca.gov

**Subject:** Appeal of the Draft RHNA Allocation for the City of South Gate

**RECOMMENDED ACTION:**

Deny the appeal filed by City of South Gate to reduce the Draft RHNA Allocation for the City of South Gate by 1,632 units.

**STRATEGIC PLAN:**

This item supports the following Strategic Plan Goal 2: Advance Southern California’s policy interests and planning priorities through regional, statewide, and national engagement and advocacy.

**SUMMARY OF APPEAL:**

The City of South Gate requests a reduction of its RHNA allocation by 1,632 units (from 8,263 units to 6,631 units) based on the following issues:

- 1) Application of the adopted Final RHNA Methodology for the 6<sup>th</sup> Cycle RHNA (2021 – 2029)
- 2) Affirmatively furthering fair housing

**RATIONALE FOR STAFF RECOMMENDATION:**

Staff have reviewed the appeal and recommend no change to the City of South Gate’s RHNA allocation. Regarding Issue 1, the City does not provide evidence of misapplication of the adopted Final RHNA Methodology for the 6th Cycle RHNA (2021 - 2029). Regarding Issue 2, the jurisdiction did not provide evidence that it has a majority of its population (over 50 percent) within areas of high segregation and poverty or low resource areas, as defined by the California Tax Credit Allocation Committee (TCAC)/HCD Opportunity Index Scores.

**BACKGROUND:**

**Draft RHNA Allocation**

Following the adoption of the Final RHNA Methodology on March 5, 2020 and the adoption of

**OUR MISSION**

*To foster innovative regional solutions that improve the lives of Southern Californians through inclusive collaboration, visionary planning, regional advocacy, information sharing, and promoting best practices.*

**OUR VISION**

*Southern California’s Catalyst for a Brighter Future*

**OUR CORE VALUES**

*Be Open | Lead by Example | Make an Impact | Be Courageous*



Connect SoCal on September 3, 2020, all local jurisdictions received draft RHNA allocations on September 11, 2020. A summary is below.

**Total RHNA for the City of South Gate: 8,263 units**

- Very Low Income: 2,131 units
- Low Income: 991 units
- Moderate Income: 1,171 units
- Above Moderate Income: 3,970 units

Additional background related to the Draft RHNA Allocation is included in Attachment 1.

**Summary of Comments Received during 45-day Comment Period**

No comments were received from local jurisdictions or HCD during the 45-day public comment period described in Government Code section 65584.05(c) which specifically regard the appeal filed for the City of South Gate. Three comments were received which relate to appeals filed generally:

- HCD submitted a comment on December 10, 2020 delineating the statutory basis for RHNA appeals and the requirement that any appeals granted must include written findings regarding how revisions are necessary to further RHNA's statutory objectives.
- The City of Whittier submitted a comment on December 10, 2020 supporting surrounding cities in their appeals but expressing concern that additional units may be applied to Whittier if reallocated from cities which are successful in their appeals.
- The City of Long Beach submitted a comment on December 3, 2020 indicating their view that the RHNA allocation process was fair and transparent, their support for evaluating appeals on their merits (specifically those from the Gateway Council of Governments), and their opposition to any action which would result in a transfer of additional units to Long Beach.

**ANALYSIS:**

**Issue 1: Application of the adopted Final RHNA Methodology for the 6th Cycle RHNA (2021 - 2029) [Government Code Section 65584.05 (b)(1)].**

*The City of South Gate argues that it is unfairly burdened by the application of the methodology compared to surrounding jurisdictions in the Gateway Cities COG, resulting in a required growth of 33.7 percent over existing housing stock in the next 8 year which is unobtainable for a City built in an urban environment.*

**SCAG Staff Response:** SCAG’s final regional determination of approximately 1.34 million units was issued by HCD on October 15, 2019 per state housing law. State statute outlines a very specific process for arriving at a regional housing needs determination for RHNA. It also prescribes a specific timeline which necessitated the completion of the regional determination step by fall 2019 in order to allow sufficient time for the development of a methodology, appeals, and local housing element updates. The regional determination is not a basis for appeal per adopted RHNA Appeals Procedures as it is not within the authority of the Appeals Board to make any changes to HCD’s regional housing needs assessment. Only improper application of the methodology is grounds for an appeal. An example of an improper application of the adopted methodology might be a data error which was identified by a local jurisdiction.

SCAG recognizes that a 33.7 percent increase in housing units for the City of South Gate is substantial compared to the existing housing stock. This is largely a result of the high regional housing number of 1,341,827 called for by HCD in their regional determination for SCAG. According to the state Department of Finance’s 2019 data the region had 6,592,458 housing units—meaning that HCD expects the entire region to plan for a 20.4% increase in units.

Ultimately whether a city is above or below this regional average level depends on factors explained in the RHNA methodology. While comparing a RHNA allocation versus the existing housing stock may provide an intuitive comparison of magnitude, it is not a measure which is referenced in statute related to the regional determination or allocation methodology. Thus, SCAG staff does not recommend a reduction to its Draft RHNA Allocation based on this factor.

While SCAG understands that South Gate is located in an urban environment, pursuant to Government Code Section 65584.04(e)(2)(B), SCAG “may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality” (which includes the land use policies in its General Plan). “Available land suitable for urban development or conversion to residential use,” as expressed in Section 65584.04(e)(2)(b), is not restricted to vacant sites; rather, it specifically indicates that underutilized land, opportunities for infill development, and increased residential densities are a component of “available” land. As indicated by HCD in its December 10, 2020 comment letter (HCD Letter):

“In simple terms, this means housing planning cannot be limited to vacant land, and even communities that view themselves as built out must plan for housing through means such as rezoning commercial areas as mixed-use areas and upzoning non-vacant land.” (HCD Letter at p. 2).

As such, the City can consider other opportunities for development. This includes the availability of underutilized land, opportunities for infill development and increased residential densities, or

alternative zoning and density. Alternative development opportunities should be explored further and could possibly provide the land needed to zone for the City's projected growth.

***Issue 2: Affirmatively furthering fair housing.***

*The City argues that South Gate is equally, if not more, impacted by factors such as low income/poverty and minority concentrations compared to other DACs. However, because the designation of "disadvantaged" is not applied at the census tract level in the RHNA methodology, South Gate is being burdened with an additional 667 units of the residual need despite being impacted by similar factors as other DACs in the Gateway Cities COG. The City provides a supporting composite index and figures to demonstrate levels of low-income, poverty, and minority populations in South Gate relative to other Gateway cities who were considered DACs.*

**SCAG Staff Response:** The adopted RHNA methodology has a clear delineation to determine whether a jurisdiction is identified as a disadvantaged community, or DAC. The adopted RHNA methodology defines a DAC as a jurisdiction where more than half of its population lives in high segregation and poverty or low resource areas as defined by the California Tax Credit Allocation Committee (TCAC)/HCD Opportunity Index Scores.<sup>1</sup> Per this methodology, DACs where the calculated projected and existing need is higher than the jurisdiction's household growth between 2020 and 2045 are considered as having "residual" existing need. Residual need was subtracted from jurisdictional need in these cases so that the maximum a DAC jurisdiction would receive for existing need is equivalent to its 2020 to 2045 household growth. In other words, this household growth is a cap on units to be allocated to DACs. Residual existing need was tabulated by county and then redistributed within the same county to non-DAC jurisdictions. The purpose of this was to further two of the five objectives of State housing law, avoiding an overconcentration of lower income households where they are already located and affirmatively further fair housing. The adopted methodology was applied consistently across all jurisdictions in the SCAG region. HCD agrees with this:

"This cap furthers the statutory objective to affirmatively further fair housing by allocating more units to high opportunity areas and fewer units to low resource communities, and concentrated areas of poverty with high levels of segregation." (HCD Letter at p.2).

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<sup>1</sup> The TCAC and HCD Opportunity mapping tool includes a total of 11 census-tract level indices to measure exposure to opportunity based on measures of economic, environmental, and educational factors (poverty, adult education, employment, low-wage job proximity, medium home value, CalEnviroScreen 3.0 indicators, math/reading proficiency, high school graduation rates, and student rate poverty). Regional patterns of segregation are also identified based on this tool. Based on its respective access to opportunity, each census tract is given a score that designates it under one of the following categories: High segregation & poverty, Low resource, Moderate resource, High resource, and Highest resource. Tract-level indices were summed to the jurisdictional-level by SCAG using area-weighted interpolation. Using 2013-2017 American Community Survey population data, SCAG determined the share of each jurisdiction's population in each of these five categories.

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Using this adopted RHNA methodology, the City of South Gate's population in low/very low-resource tracts is 47.88 percent, which is below the 50 percent threshold to be considered a DAC. While SCAG recognizes there may be other ways to assess resource levels, disadvantage, and segregation, such as the City of South Gate's composite index and figures, alternative methodologies to define DACs cannot be considered as part of the RHNA appeal process. Furthermore, the City does not suggest that SCAG improperly applied the RHNA methodology with respect to DACs. Moreover, the jurisdiction has not provided evidence that it has a majority of its population (over 50 percent) within areas of high segregation and poverty or low resource areas, as defined by the California Tax Credit Allocation Committee (TCAC)/HCD Opportunity Index Scores. As such, it cannot be considered as a DAC under the adopted RHNA methodology (despite having 51% of the population being comprised of lower income households).

One of the five objectives of RHNA law is to ensure that the RHNA allocation plan allocates "a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category". (Govt. Code § 65584(d)(4)). While SCAG staff accepts the assertion that the jurisdiction has a currently disproportionately high percentage of lower income households in comparison to the County of Los Angeles (51% and 41%, respectively), the RHNA methodology, as noted above, is based on the TCAC/HCD Opportunity Index scores not just income and addresses this disparity through its social equity adjustment and inclusion of access to resources as an influencing factor.

To further the objectives of allocating a lower proportion of households by income and affirmatively furthering fair housing (AFFH), the RHNA methodology includes a minimum 150 percent social equity adjustment and an additional 10 to 30 percent added in areas with significant populations that are defined as very low or very high resource areas, referred to as an AFFH adjustment. A social equity adjustment ensures that jurisdictions accommodate their fair share of each income category. It does so by adjusting current household income distribution in comparison to county distribution. The result is that jurisdictions that have a higher concentration of lower income households than the county will receive lower percentages of RHNA for the lower income categories. For example, for the City of South Gate, 24% of the jurisdiction's Draft RHNA Allocation is assigned for the very low income category, which is lower than its current 29% and lower than the county distribution of 26%. Thus, the RHNA methodology, and by extension the jurisdiction's Draft RHNA Allocation, has already considered this objective to ensure that there is not an overconcentration of lower income households in these currently impacted areas. For this reason, SCAG staff does not recommend a reduction to its draft RHNA allocation based on this factor.

**FISCAL IMPACT:**

Work associated with this item is included in the current FY20-21 Overall Work Program (300-4872Y0.02: Regional Housing Needs Assessment).



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**ATTACHMENT(S):**

1. Local Input and Development of Draft RHNA Allocation (City of South Gate)
2. Appeal Form and Supporting Documentation (City of South Gate)
3. Comments Received During the Comment Period (General)

## **Attachment 1: Local Input and Development of Draft RHNA Allocation**

This attachment sets forth the nature and timing of the opportunities which the City of South Gate had to provide information and local input on SCAG's growth forecast, the RHNA methodology, and the Growth Vision of the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). It also describes how the RHNA Methodology development process integrates this information in order to develop the City of South Gate's Draft RHNA Allocation.

### **1. Local Input**

#### ***a. Bottom-Up Local Input and Envisioning Process***

On October 31, 2017, SCAG took the first step toward developing draft RHNA allocations by initiating the Bottom-Up Local Input and Envisioning Process. At the direction of the Regional Council, the objective of this process was to seek local input and data to prepare for Connect SoCal and the 6<sup>th</sup> cycle of RHNA.<sup>1</sup> Each jurisdiction was provided with a package of land use, transportation, environmental, and growth forecast data for review and revision which was due on October 1, 2018.<sup>2</sup> While the local input process materials focus principally on jurisdiction-level and Transportation Analysis Zone (TAZ) level growth, input on specific parcels, sites, and project areas were welcomed and integrated into SCAG's growth forecast as well as data on other elements. SCAG met one-on-one with all 197 local jurisdictions between November 2017 and July 2018 and provided training opportunities and staff support. Following input from SCAG's Technical Working Group (TWG), the Connect SoCal growth forecast reflected precisely the jurisdiction-level growth totals provided during this process.

Input from the City of South Gate on the growth forecast was received in November 2018. Following input, household totals were 23,992 in 2020 and 24,621 in 2030 (growth of 629 households), for a reduced household growth during this period of 1,781 from preliminary growth forecast data.

#### ***b. RHNA Methodology Surveys***

On March 19, 2019, SCAG distributed a packet of methodology surveys, which included the local planning factor survey (formerly known as the AB2158 factor survey), Affirmatively Furthering Fair

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<sup>1</sup> While the RTP/SCS and RHNA share data elements, they are distinct processes. The RTP/SCS growth forecast provides an assessment of reasonably foreseeable future patterns of employment, population, and household growth in the region given demographic and economic trends, and existing local and regional policy priorities. The RHNA identifies anticipated housing need over a specified eight-year period and requires that local jurisdictions make available sufficient zoned capacity to accommodate this need. A further discussion of the relationship between these processes can be found in Connect SoCal Master Response 1 at: [https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal\\_Public-Participation-Appendix-2.pdf](https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal_Public-Participation-Appendix-2.pdf).

<sup>2</sup> A detailed list of data during this process reviewed can be found in each jurisdiction's Draft Data/Map Book at <http://scagrtpscs.net/Pages/DataMapBooks.aspx>

Housing (AFFH) survey, and replacement need survey, to SCAG jurisdictions' Community Development Directors. Surveys were due on April 30, 2019. SCAG reviewed all submitted responses as part of the development of the Draft RHNA Methodology. The City of South Gate submitted the following surveys prior to the adoption of the Draft RHNA Methodology:

- Local planning factor survey
- Affirmatively Furthering Fair Housing (AFFH) survey
- Replacement need survey
- No survey was submitted to SCAG

**c. *Connect SoCal Growth Vision and Additional Refinements***

Beginning in May 2018, SCAG's Sustainable Communities Working Group began the process of developing growth scenarios for the SCAG region. The culmination of this work was the development of the Connect SoCal Growth Vision, which directly uses jurisdictional-level growth projections from the Bottom-Up Local Input and Envisioning process, and also features strategies for growth at the TAZ-level that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Additional detail regarding the Connect SoCal Growth Vision, specifically the Transportation Analysis Zone (TAZ, or neighborhood) level projections is found at <https://www.connectsocial.org/Documents/DataMapBooks/Growth-Vision-Methodology.pdf>.

As a result of these strategies, in some jurisdictions growth at the TAZ-level differed from locally anticipated growth conveyed during the Bottom-Up Local Input and Envisioning Process.

As such, SCAG provided two additional opportunities for all local jurisdictions to make TAZ-level technical refinements on the topics of general plan capacities and entitlements. During the release of the draft Connect SoCal Plan, jurisdictions were notified on October 31, 2019 that SCAG would accept additional refinements until December 11, 2019. Following the Regional Council's decision to delay full adoption of Connect SoCal for 120 days due to the COVID-19 pandemic, all jurisdictions were again notified on May 26, 2020 that SCAG would accept additional refinements until June 9, 2020.

Connect SoCal Growth Vision data have been available to local jurisdiction staff during the entirety of this process through SCAG's Scenario Planning Model Data Management Site (SPM-DM) at <http://spmDM.scag.ca.gov> and updates were shared with local jurisdictions on technical refinements to the data in February 2020 and August 2020 to share the results of both review opportunities. SCAG did not receive additional technical corrections from the City of South Gate from which differed from the Growth Vision.

## 2. Development of the Final RHNA Methodology

SCAG convened the first meeting of the RHNA Subcommittee in October 2018. In their subsequent monthly meetings, this body reviewed and advised on the development of SCAG's 6<sup>th</sup> cycle RHNA process, including the development of the RHNA methodology. Per Government Code 65584.04(a), SCAG must develop a RHNA methodology which furthers the five statutory objectives of RHNA:

*(1) Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households.*

*(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.*

*(3) Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.*

*(4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.*

*(5) Affirmatively furthering fair housing (Govt. Code § 65584(d)).*

As explained in more detail below, the Draft RHNA Methodology (which was adopted as the Final RHNA Methodology) set forth the policy factors, data sources, and calculations which would be used to generate draft RHNA allocations for all local jurisdictions. Following extensive debate and public comment, SCAG's Regional Council voted to approve the Draft RHNA Methodology on November 7, 2019 and provide it to HCD for review. Per Government Code 65584.04(i), HCD is vested with the authority to determine whether a methodology furthers the objectives set forth in Government Code section 65584(d). On January 13, 2020, HCD found that the Draft RHNA Methodology furthers these five statutory objectives of RHNA. Specifically, HCD noted that:

*"This methodology generally distributes more RHNA, particularly lower income RHNA, near jobs, transit, and resources linked to long term improvements of life outcomes. In particular, HCD applauds the use of the objective factors specifically linked the statutory objectives in the existing need methodology." (Letter from HCD to SCAG*



dated January 13, 2020 at <https://scag.ca.gov/sites/main/files/file-attachments/hcd-review-rc-approved-draft-rhna-methodology.pdf?1602190239>).

On March 5, 2020, again following extensive debate and public comment, the Regional Council voted to approve the Draft RHNA Methodology as the Final RHNA Methodology. Unlike SCAG's 5<sup>th</sup> cycle RHNA methodology which relies almost entirely on the household growth component of the RTP/SCS, SCAG's 6<sup>th</sup> cycle RHNA methodology consists of two primary elements: "projected need" which includes the number of housing units required to accommodate anticipated population growth over the 8-year RHNA planning period and "existing need," which refers to the number of housing units required to accommodate excess or unsatisfied housing demand experienced by the region's current population.<sup>3</sup> Furthermore, the Final RHNA methodology utilizes measures of 2045 job accessibility and High Quality Transit Area (HQTA) population measures based on TAZ-level projections in the Connect SoCal Growth Vision.

More specifically, the Final RHNA Methodology considers three primary factors in determining a local jurisdiction's total housing need which are primarily based on data from Connect SoCal's aforementioned Bottom-Up Local Input and Envisioning Process:

- Forecasted growth over 2020-2030 (projected need)
- Transit accessibility in 2045 (existing need)
- Job accessibility in 2045 (existing need)

The methodology is described in further detail at:  
<http://scag.ca.gov/programs/Documents/RHNA/SCAG-Final-RHNA-Methodology-030520.pdf>.

### 3. Draft RHNA Allocation for the City of South Gate

Following the adoption of the Final RHNA Methodology on March 5, 2020 and the 120 day delay due to the COVID-19 pandemic, SCAG adopted Connect SoCal on September 3, 2020, and the City of South Gate received its draft RHNA allocation on September 11, 2020. Application of the RHNA methodology yields the draft RHNA allocation for the City of South Gate as summarized in the data and calculations in the tables below.

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<sup>3</sup> Legislative changes in 2018 modified the nature of the regional housing need determination for the 6<sup>th</sup> cycle of RHNA by adding measures of household overcrowding and housing cost burden to the list of factors to be considered by HCD for the determination of housing need. These new measures are not included in the Connect SoCal Growth Forecast because they are not direct inputs to the growth forecasting process and are independent of employment and population projections. In contrast, they reflect additional latent housing needs in the current population (i.e. "existing need") and would not result in a change in regional population. For further discussion see Connect SoCal Master Response 1 at [https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal\\_Public-Participation-Appendix-2.pdf](https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal_Public-Participation-Appendix-2.pdf).

| <b>South Gate city statistics and inputs:</b>  |           |
|--|-----------|
| Forecasted household (HH) growth, RHNA period:<br><i>(2020-2030 Household Growth * 0.825)</i>  | 519       |
| Percent of households who are renting:   | 56%       |
| Housing unit loss from demolition (2009-18):   | 2         |
| Adjusted forecasted household growth, 2020-2045:<br><i>(Local input growth forecast total adjusted by the difference between the RHNA determination and SCAG's regional 2020-2045 forecast, +4%)</i> | 1,666     |
| Percent of regional jobs accessible in 30 mins (2045):<br><i>(For the jurisdiction's median TAZ)</i>   | 18.20%    |
| Jobs accessible from the jurisdiction's median TAZ (2045):<br><i>(Based on Connect SoCal's 2045 regional forecast of 10.049M jobs)</i>   | 1,829,000 |
| Share of region's job accessibility (population weighted):   | 0.75%     |
| Jurisdiction's HQTAs population (2045):  | 95,519    |
| Share of region's HQTAs population (2045):   | 0.93%     |
| Share of population in low/very low-resource tracts:   | 47.88%    |
| Share of population in very high-resource tracts:  | 0.00%     |
| Social equity adjustment:  | 150%      |

| Calculation of Draft RHNA Allocation for South Gate city  |             |
|---|-------------|
| Forecasted household (HH) growth, RHNA period:  | 519         |
| Vacancy Adjustment<br><i>(5% for renter households and 1.5% for owner households)</i>   | 18          |
| Replacement Need  | 2           |
| <b>TOTAL PROJECTED NEED:</b>  | <b>539</b>  |
| Existing need due to job accessibility (50%)  | 3150        |
| Existing need due to HQTAs pop. share (50%)   | 3907        |
| Net residual factor for existing need<br><i>(Negative values reflect a cap on lower-resourced community with good job and/or transit access. Positive values represent this amount being redistributed to higher-resourced communities based on their job and/or transit access.)</i> | 667         |
| <b>TOTAL EXISTING NEED</b>  | <b>7724</b> |
| <b>TOTAL RHNA FOR SOUTH GATE CITY</b>   | <b>8263</b> |
| Very-low income (<50% of AMI)   | 2131        |
| Low income (50-80% of AMI)  | 991         |
| Moderate income (80-120% of AMI)  | 1171        |
| Above moderate income (>120% of AMI)  | 3970        |

The transit accessibility measure is based on the population anticipated to live in High-Quality Transit Areas (HQTAs) in 2045 based on Connect SoCal’s designation of high-quality transit areas and population forecasts. With a forecasted 2045 population of 95,519 living within HQTAs, the City of South Gate represents 0.93% of the SCAG region’s HQTAs population, which is the basis for allocating housing units based on transit accessibility.

Job accessibility is defined as the jurisdiction’s share of regional jobs accessible within a 30-minute drive commute. Since over 80 percent of the region’s workers live and work in different jurisdictions,

the RHNA methodology uses a measure based on Connect SoCal’s travel demand model output for the year 2045 rather than assigning housing units based on the number of jobs with a specific jurisdiction. Specifically, the share of future (2045) regional jobs which can be reached in a 30-minute automobile commute from the local jurisdiction’s median TAZ is used as to allocate housing units based on transit accessibility. From the City of South Gate’s median TAZ, it will be possible to reach 18.20% of the region’s jobs in 2045 within a 30-minute automobile commute (1,829,000 jobs, based on Connect SoCal’s 2045 regional job forecast of 10,049,000 jobs).

An additional factor is included in the methodology to account for RHNA Objective #5 - Affirmatively Further Fair Housing (AFFH). Several jurisdictions in the region which are considered disadvantaged communities (DACs) on the basis of access to opportunity measures (described further in the RHNA methodology document), but which also score highly in job and transit access, may have their total RHNA allocations capped based on their long-range (2045) household forecast. This additional housing need, referred to as residual, is then reallocated to non-DAC jurisdictions in order to ensure housing units are placed in higher-resourced communities consistent with AFFH principles. This reallocation is based on the job and transit access measures described above, and results in an additional 667 units assigned to the City of South Gate.

Please note that the above represents only a partial description of key data and calculations in the RHNA methodology.

**Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form**  
*All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.*  
*Appeals and supporting documentation should be submitted to [housing@scaq.ca.gov](mailto:housing@scaq.ca.gov).*  
*Late submissions will not be accepted.*

Date: \_\_\_\_\_ Jurisdiction Subject to This Appeal Filing: \_\_\_\_\_  
 (to file another appeal, please use another form)

Filing Party (Jurisdiction or HCD)  
 \_\_\_\_\_

Filing Party Contact Name \_\_\_\_\_ Filing Party Email: \_\_\_\_\_

**APPEAL AUTHORIZED BY:**

Name: \_\_\_\_\_

**PLEASE SELECT BELOW:**

- Mayor
- Chief Administrative Office
- City Manager
- Chair of County Board of Supervisors
- Planning Director
- Other: \_\_\_\_\_

**BASES FOR APPEAL**

- Application of the adopted Final RHNA Methodology for the 6<sup>th</sup> Cycle RHNA (2021-2029)
- Local Planning Factors and/or Information Related to Affirmatively Furthering Fair Housing (See Government Code Section 65584.04 (b)(2) and (e))
  - Existing or projected jobs-housing balance
  - Sewer or water infrastructure constraints for additional development
  - Availability of land suitable for urban development or for conversion to residential use
  - Lands protected from urban development under existing federal or state programs
  - County policies to preserve prime agricultural land
  - Distribution of household growth assumed for purposes of comparable Regional Transportation Plans
  - County-city agreements to direct growth toward incorporated areas of County
  - Loss of units contained in assisted housing developments
  - High housing cost burdens
  - The rate of overcrowding
  - Housing needs of farmworkers
  - Housing needs generated by the presence of a university campus within a jurisdiction
  - Loss of units during a state of emergency
  - The region’s greenhouse gas emissions targets
  - Affirmatively furthering fair housing
- Changed Circumstances (Per Government Code Section 65584.05(b), appeals based on change of circumstance can only be made by the jurisdiction or jurisdictions where the change in circumstance occurred)

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_ Hearing Date: \_\_\_\_\_ Planner: \_\_\_\_\_

**Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form**  
*All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.*  
*Appeals and supporting documentation should be submitted to [housing@scaq.ca.gov](mailto:housing@scaq.ca.gov).*  
*Late submissions will not be accepted.*

**Brief statement on why this revision is necessary to further the intent of the objectives listed in Government Code Section 65584 (please refer to Exhibit C of the Appeals Guidelines):**

**Please include supporting documentation for evidence as needed, and attach additional pages if you need more room.**

**Brief Description of Appeal Request and Desired Outcome:**

**Number of units requested to be reduced or added to the jurisdiction's draft RHNA allocation (circle one):**

Reduced \_\_\_\_\_ Added \_\_\_\_\_

**List of Supporting Documentation, by Title and Number of Pages**  
**(Numbers may be continued to accommodate additional supporting documentation):**

- 1.
- 2.
- 3.

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_

Hearing Date: \_\_\_\_\_

Planner: \_\_\_\_\_



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October 20, 2020

**RHNA Subcommittee**

**900 Wilshire Blvd., Ste. 1700**

**Los Angeles, CA 90017**

**RE: City of South Gate 6<sup>th</sup> RHNA Cycle Appeal**

To Whom It May Concern:

This letter is an official appeal of the allocated RHNA of 8,263 units for the 2021-2029 planning period to the City of South Gate. It is the position of the City of South Gate that the number of units is an inequitable distribution of RHNA and respectfully submits this appeal based *local planning factors and information on affirmatively furthering fair housing (AFFH)*.

### **Inequitable Distribution of RHNA**

The City of South Gate has been allocated a RHNA of 8,263 units for the 2021-2029 planning period. This RHNA represents 33.7 percent of the City's 2020 housing inventory, ranking South Gate the top 11<sup>th</sup> jurisdiction within the SCAG region for the highest proportion of RHNA to existing housing stock. Among the top ten communities with higher proportion of RHNA to existing housing stock, seven are located in the Inland Empire where the availability of land for development may not be an issue. The City of South Gate is located in an urbanized area where future development relies entirely on infill development and recycling of existing uses. It is unimaginable that South Gate would be considered comparable to Inland Empire communities.

South Gate ranks the highest among all Gateway cities in numeric and proportion of its RHNA to existing housing stock. Within the Gateway Cities COG, South Gate represents only 4.5 percent of the subregion's existing housing inventory but is being made responsible for 10.4 percent of the subregion's future growth. In fact, South Gate's RHNA (8,263 units) is close to three times the subregional average (2,942 units).

If South Gate were to have been allocated the subregion's average of RHNA (14.6 percent of existing housing stock), its 6<sup>th</sup> cycle RHNA would have been 3,586 units. Even if South Gate were just to be even with the next highest RHNA allocation within Gateway Cities COG – Montebello at 25.8 percent – its RHNA



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would have been 6,332 units. Among South Gate and its immediate neighbors (Downey, Huntington Park, Lynwood, Maywood, Bell Gardens, and Bell), the average RHNA allocation represents only 16.3 percent of the existing housing inventory.

A key objective of the RHNA is to expand the supply of housing throughout the region in an equitable manner. This magnitude of discrepancies between South Gate and other Gateway Cities and across the entire SCAG region cannot be deemed equitable. No other community in the Gateway Cities COG receives such a high RHNA.

**The City of South Gate contests this allocation and requests a more equitable allocation. The City proposes to at least close the gap between South Gate and Montebello, meeting the next highest proportional allocation halfway for a reduction of 965 units.**

**Table 1: RHNA versus Existing Housing Stock – Gateway Cities**





| Jurisdiction          | County      | Total  | VL    | L     | M     | AM     | 2020 HUs | RHNA% |
|-----------------------|-------------|--------|-------|-------|-------|--------|----------|-------|
| South Gate city       | Los Angeles | 8,263  | 2,131 | 991   | 1,171 | 3,970  | 24,540   | 33.7% |
| Montebello city       | Los Angeles | 5,174  | 1,311 | 705   | 775   | 2,383  | 20,051   | 25.8% |
| Industry city         | Los Angeles | 17     | 6     | 4     | 2     | 5      | 68       | 25.0% |
| Pico Rivera city      | Los Angeles | 3,939  | 1,149 | 562   | 572   | 1,656  | 17,173   | 22.9% |
| Artesia city          | Los Angeles | 1,067  | 311   | 168   | 128   | 460    | 4,731    | 22.6% |
| Downey city           | Los Angeles | 6,510  | 2,074 | 944   | 913   | 2,579  | 35,838   | 18.2% |
| Norwalk city          | Los Angeles | 5,022  | 1,542 | 757   | 657   | 2,066  | 28,135   | 17.8% |
| Santa Fe Springs city | Los Angeles | 950    | 252   | 159   | 152   | 387    | 5,514    | 17.2% |
| Long Beach city       | Los Angeles | 26,440 | 7,123 | 4,038 | 4,149 | 11,130 | 177,783  | 14.9% |
| Bellflower city       | Los Angeles | 3,726  | 1,012 | 487   | 552   | 1,675  | 25,097   | 14.8% |
| Lakewood city         | Los Angeles | 3,914  | 1,293 | 636   | 652   | 1,333  | 27,598   | 14.2% |
| La Mirada city        | Los Angeles | 1,957  | 633   | 341   | 319   | 664    | 15,175   | 12.9% |
| Vernon city           | Los Angeles | 9      | 5     | 4     | -     | -      | 76       | 11.8% |
| Cerritos city         | Los Angeles | 1,903  | 678   | 344   | 331   | 550    | 16,204   | 11.7% |
| Whittier city         | Los Angeles | 3,431  | 1,022 | 536   | 555   | 1,318  | 29,721   | 11.5% |
| Signal Hill city      | Los Angeles | 516    | 160   | 78    | 90    | 188    | 4,631    | 11.1% |
| Huntington Park city  | Los Angeles | 1,601  | 263   | 196   | 242   | 900    | 15,228   | 10.5% |
| Lynwood city          | Los Angeles | 1,555  | 376   | 139   | 235   | 805    | 15,341   | 10.1% |
| Hawaiian Gardens city | Los Angeles | 331    | 61    | 44    | 46    | 180    | 3,724    | 8.9%  |
| Commerce city         | Los Angeles | 246    | 55    | 22    | 38    | 131    | 3,468    | 7.1%  |
| Cudahy city           | Los Angeles | 392    | 80    | 36    | 53    | 223    | 5,780    | 6.8%  |
| Maywood city          | Los Angeles | 363    | 54    | 47    | 55    | 207    | 6,768    | 5.4%  |
| Bell Gardens city     | Los Angeles | 501    | 99    | 29    | 72    | 301    | 10,012   | 5.0%  |
| Compton city          | Los Angeles | 1,001  | 235   | 121   | 130   | 515    | 24,637   | 4.1%  |
| Paramount city        | Los Angeles | 362    | 91    | 43    | 48    | 180    | 14,710   | 2.5%  |
| Bell city             | Los Angeles | 228    | 43    | 23    | 29    | 133    | 9,298    | 2.5%  |
| Avalon city           | Los Angeles | 27     | 8     | 5     | 3     | 11     | 2,296    | 1.2%  |
| Gateway Cities        |             | 79,445 |       |       |       |        | 543,597  | 14.6% |
| % of South Gate       |             | 10.4%  |       |       |       |        | 4.5%     |       |

**Affirmatively Furthering Fair Housing and Redistribution of Residual Need**

The concept of affirmatively furthering fair housing involves dispersing lower income housing to high resource areas, avoiding the concentration of minority and poverty. The practices of assigning areas with the federal designation of Racial and Ethnically Concentrated Areas of Poverty (R/ECAPs) and identifying areas with TCAC’s Opportunity Mapping require data at the census tract level. However, in SCAG’s RHNA methodology for the redistribution of Residual Need (excess growth), the designation of “Disadvantaged” is not applied at the census tract level. Instead, each jurisdiction is either considered “Disadvantaged” or not. As a result, despite the City of South Gate being impacted by similar factors as the “Disadvantaged Communities” in the Gateway Cities COG, South Gate is being burdened for an additional 667 units in existing needs from the redistribution of the residual need.



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Planning Division

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The City of South Gate has a minority population of 97 percent. Low and moderate income population represents 42 percent of the residents and 18.8 percent of the population is living below the poverty level. Figure 1 through Figure 4 illustrate that virtually the entire City of South Gate is impacted by high concentrations of low income, poverty, and minority.

Furthermore, a composite index of these factors indicates that South Gate ranks top 8 among the 27 communities in the Gateway Cities COG (see Table 2). In fact, for the 14 “Disadvantaged Communities” in the Gateway Cities COG that receive a RHNA “discount” from Residual Need, seven have lower composite scores than South Gate. Allocating South Gate with the highest RHNA in the Gateway Cities COG further exacerbates the high concentration of disadvantaged population in a single city.

**The City of South Gate contests the methodology for designating entire jurisdictions as Disadvantaged Communities and exempting these jurisdictions from addressing the existing needs in the region. South Gate is similarly, if not more, impacted by low income/poverty and minority concentrations, compared to many jurisdictions with the Disadvantaged Community designation. The City requests a reduction of 667 units from the Residual Need.**



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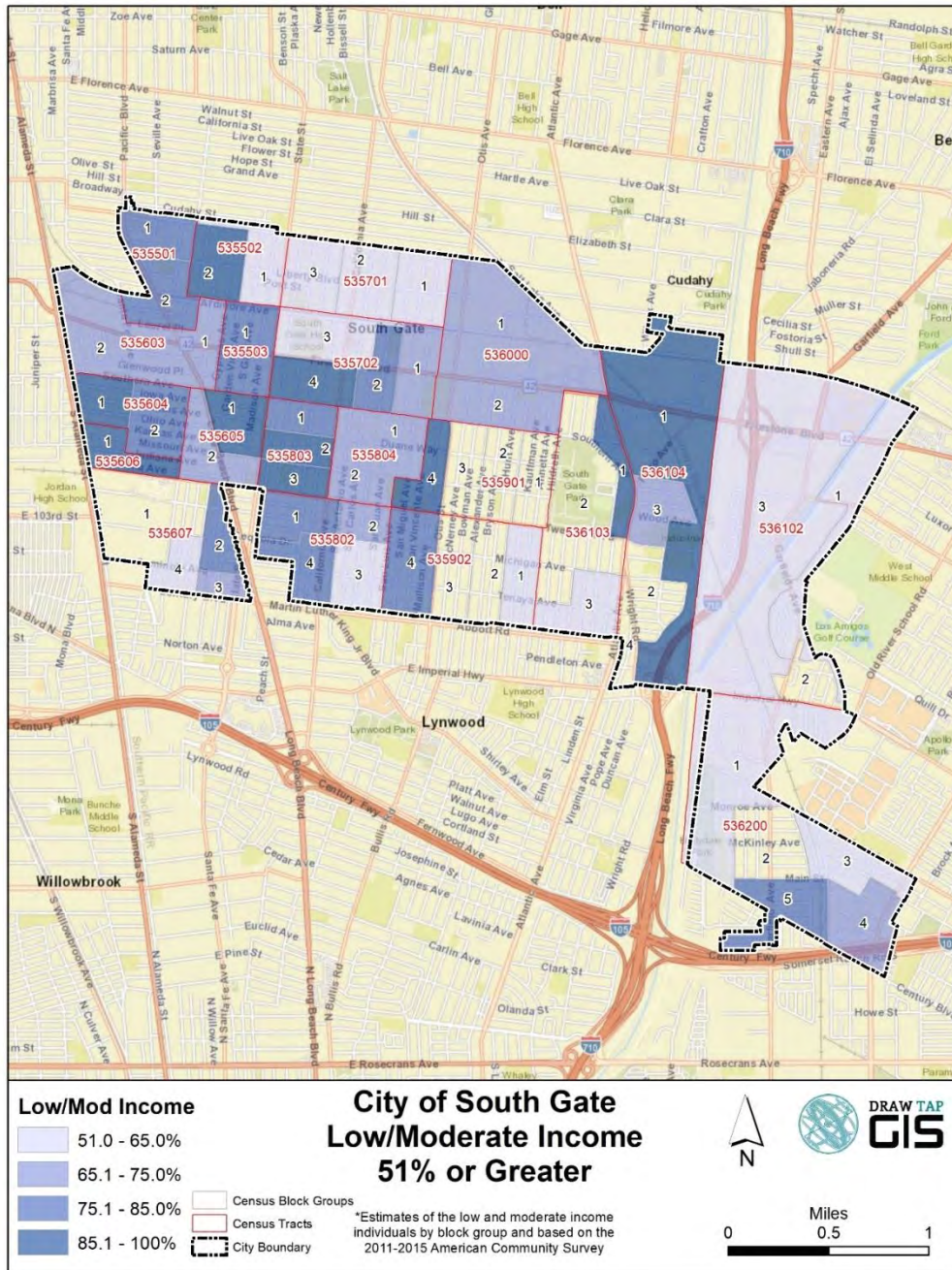
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**Table 2: Composite Index of Low Income/Poverty/Minority Populations – Gateway Cities**

| City             | 6th RHNA | % Low/Mod Pop | Total Low/Mod | Non-Hisp White | % Minority | % Living Below Poverty | Combined Index | Disadvantaged Community | Residual | Redistributed |
|------------------|----------|---------------|---------------|----------------|------------|------------------------|----------------|-------------------------|----------|---------------|
| Bell Gardens     | 501      | 27%/19%       | 46%           | 2.7%           | 97.3%      | 29.9%                  | 173.2%         | Yes                     | 2,126    | 0             |
| Cudahy           | 392      | 24%/20%       | 44%           | 2.8%           | 97.2%      | 28.0%                  | 169.2%         | Yes                     | 1,409    | 0             |
| Huntington Park  | 1,601    | 20%/18%       | 38%           | 1.5%           | 98.5%      | 26.1%                  | 162.6%         | Yes                     | 3,364    | 0             |
| Bell             | 228      | 22%/21%       | 43%           | 5.5%           | 94.5%      | 23.9%                  | 161.4%         | Yes                     | 2,381    | 0             |
| Maywood          | 363      | 18%/18%       | 36%           | 1.3%           | 98.7%      | 25.7%                  | 160.4%         | Yes                     | 1,791    | 0             |
| Compton          | 1,001    | 19%/20%       | 39%           | 1.2%           | 98.8%      | 21.9%                  | 159.7%         | Yes                     | 4,383    | 0             |
| Lynwood          | 1,555    | 23%/18%       | 41%           | 2.4%           | 97.6%      | 20.5%                  | 159.1%         | Yes                     | 3,824    | 0             |
| South Gate       | 8,263    | 22%/20%       | 42%           | 3.1%           | 96.9%      | 18.8%                  | 157.7%         | No                      | -        | 667           |
| Hawaiian Gardens | 331      | 19%/20%       | 39%           | 6.2%           | 93.8%      | 23.1%                  | 155.9%         | Yes                     | 786      | 0             |
| Commerce         | 246      | 23%/17%       | 40%           | 1.2%           | 98.8%      | 16.3%                  | 155.1%         | Yes                     | 736      | 0             |
| Paramount        | 362      | 20%/20%       | 40%           | 4.8%           | 95.2%      | 18.7%                  | 153.9%         | Yes                     | 2,181    | 0             |
| Vernon           | 9        | 41%/13%       | 54%           | 5.6%           | 94.4%      | 2.2%                   | 150.6%         | Yes                     | 12       | 0             |
| Montebello       | 5,174    | 19%/19%       | 38%           | 7.2%           | 92.8%      | 13.4%                  | 144.2%         | No                      | -        | 386           |
| Pico Rivera      | 3,939    | 17%/19%       | 36%           | 5.4%           | 94.6%      | 10.0%                  | 140.6%         | No                      | -        | 283           |
| Norwalk          | 5,022    | 16%/22%       | 38%           | 10.4%          | 89.6%      | 12.8%                  | 140.4%         | No                      | -        | 409           |
| Bellflower       | 3,726    | 20%/19%       | 39%           | 16.4%          | 83.6%      | 13.8%                  | 136.4%         | No                      | -        | 314           |
| Downey           | 6,510    | 17%/20%       | 37%           | 14.4%          | 85.6%      | 9.9%                   | 132.5%         | No                      | -        | 520           |
| Artesia          | 1,067    | 14%/24%       | 38%           | 16.8%          | 83.2%      | 10.1%                  | 131.3%         | No                      | -        | 79            |
| Santa Fe Springs | 950      | 12%/17%       | 29%           | 12.7%          | 87.3%      | 13.3%                  | 129.6%         | Yes                     | 187      | 0             |
| Long Beach       | 26,440   | 15%/17%       | 32%           | 28.1%          | 71.9%      | 18.1%                  | 122.0%         | Yes                     | 10,530   | 0             |
| Industry         | 17       | 18%/20%       | 38%           | 24.4%          | 75.6%      | 5.8%                   | 119.4%         | No                      | -        | 1             |
| Whittier         | 3,431    | 15%/16%       | 31%           | 24.7%          | 75.3%      | 10.8%                  | 117.1%         | No                      | -        | 209           |
| Signal Hill      | 516      | 16%/14%       | 30%           | 28.0%          | 72.0%      | 13.5%                  | 115.5%         | Yes                     | 508      | 0             |
| Cerritos         | 1,903    | 10%/14%       | 24%           | 14.9%          | 85.1%      | 4.9%                   | 114.0%         | No                      | -        | 161           |
| Avalon           | 27       | 12%/24%       | 36%           | 39.6%          | 60.4%      | 16.2%                  | 112.6%         | No                      | -        | 0             |
| Lakewood         | 3,914    | 13%/15%       | 38%           | 35.5%          | 64.5%      | 6.4%                   | 108.9%         | No                      | -        | 264           |
| La Mirada        | 1,957    | 11%/16%       | 27%           | 33.0%          | 67.0%      | 6.9%                   | 100.9%         | No                      | -        | 130           |



Figure 1: Low Income Concentrations





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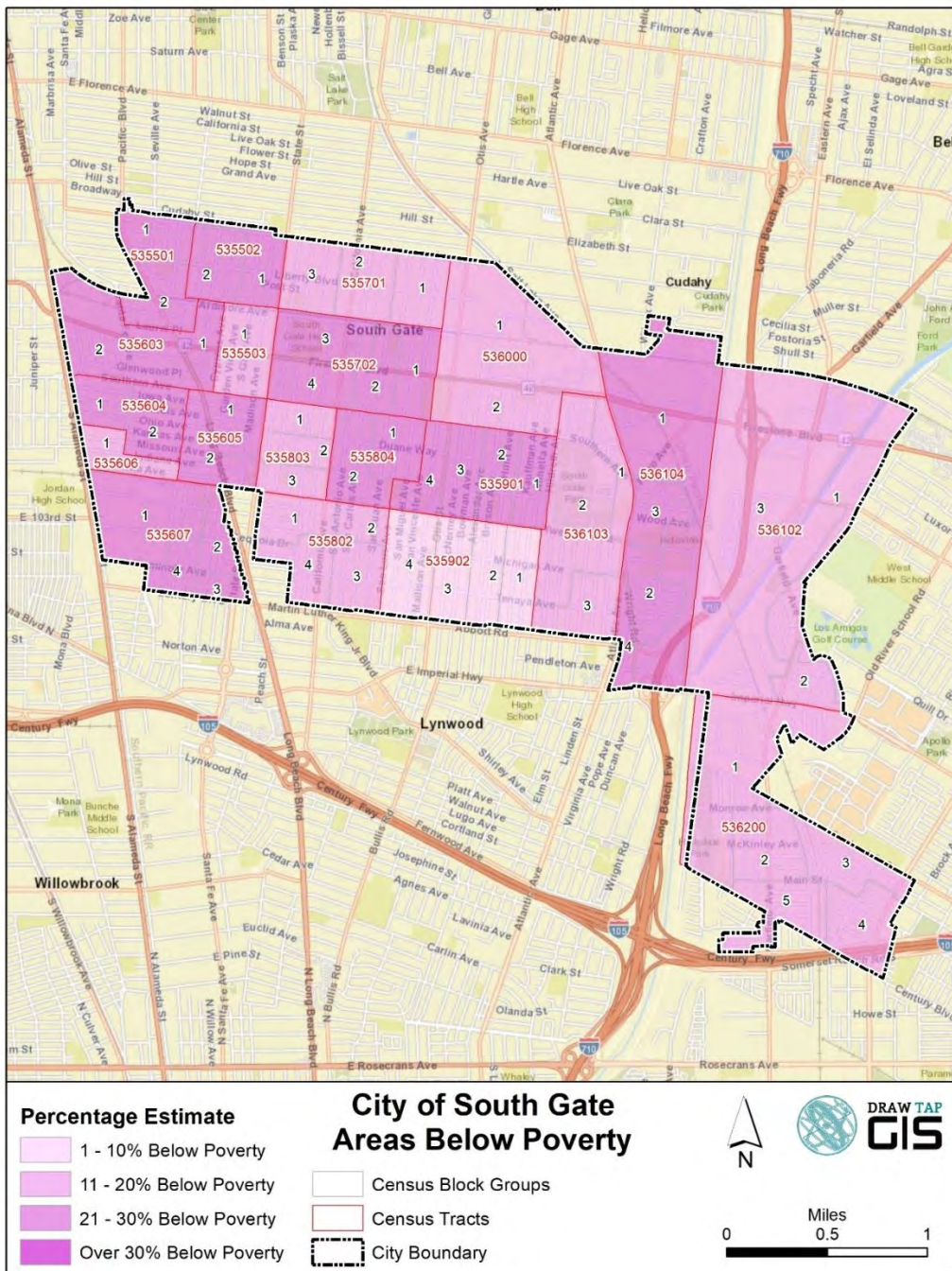
Source: HUD Low and Moderate Income Data

## Figure 2: Poverty Concentrations



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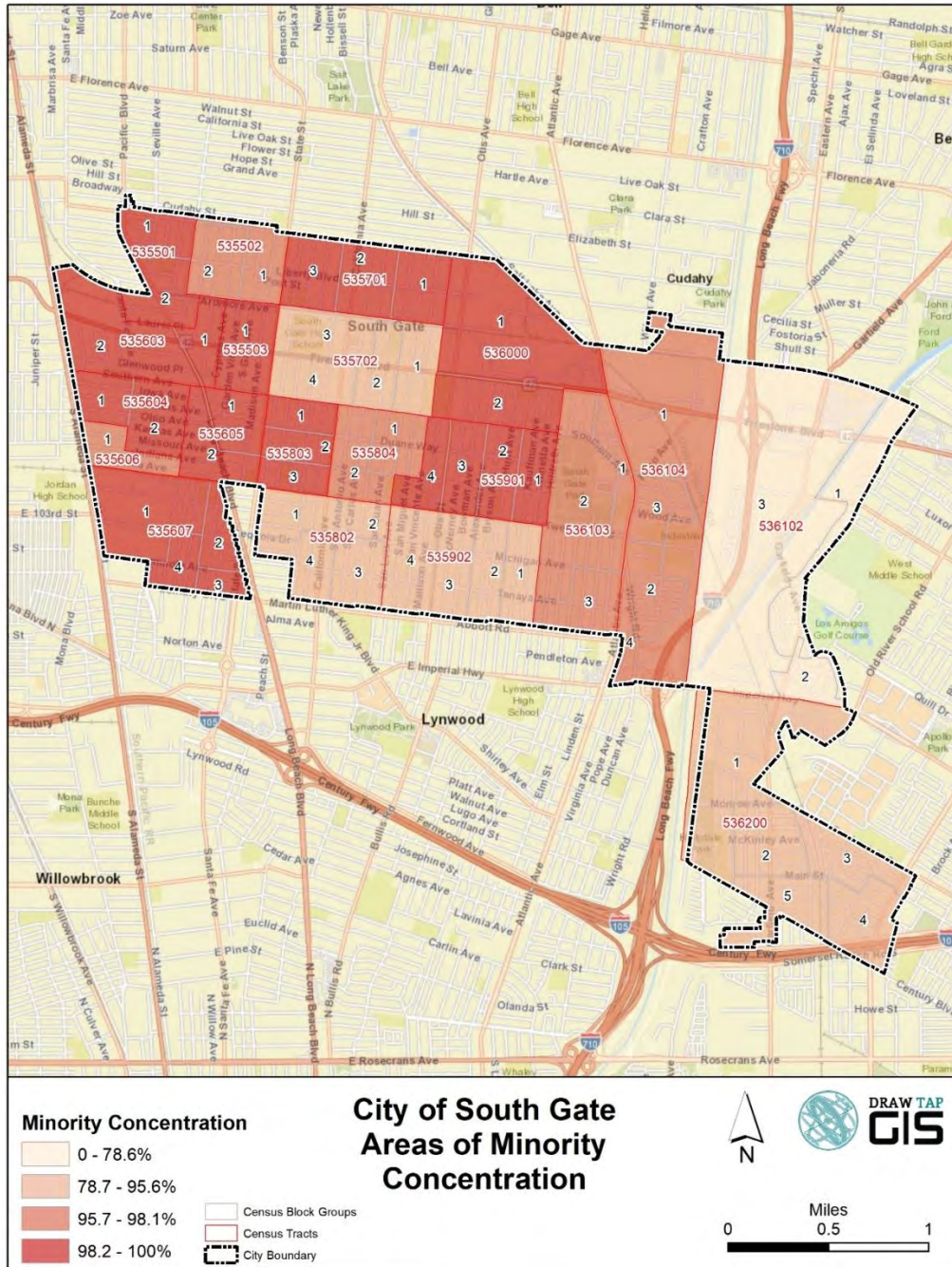
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Source: 2014-2018 ACS



Figure 3: Minority Concentrations





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Source: 2014-2018 ACS

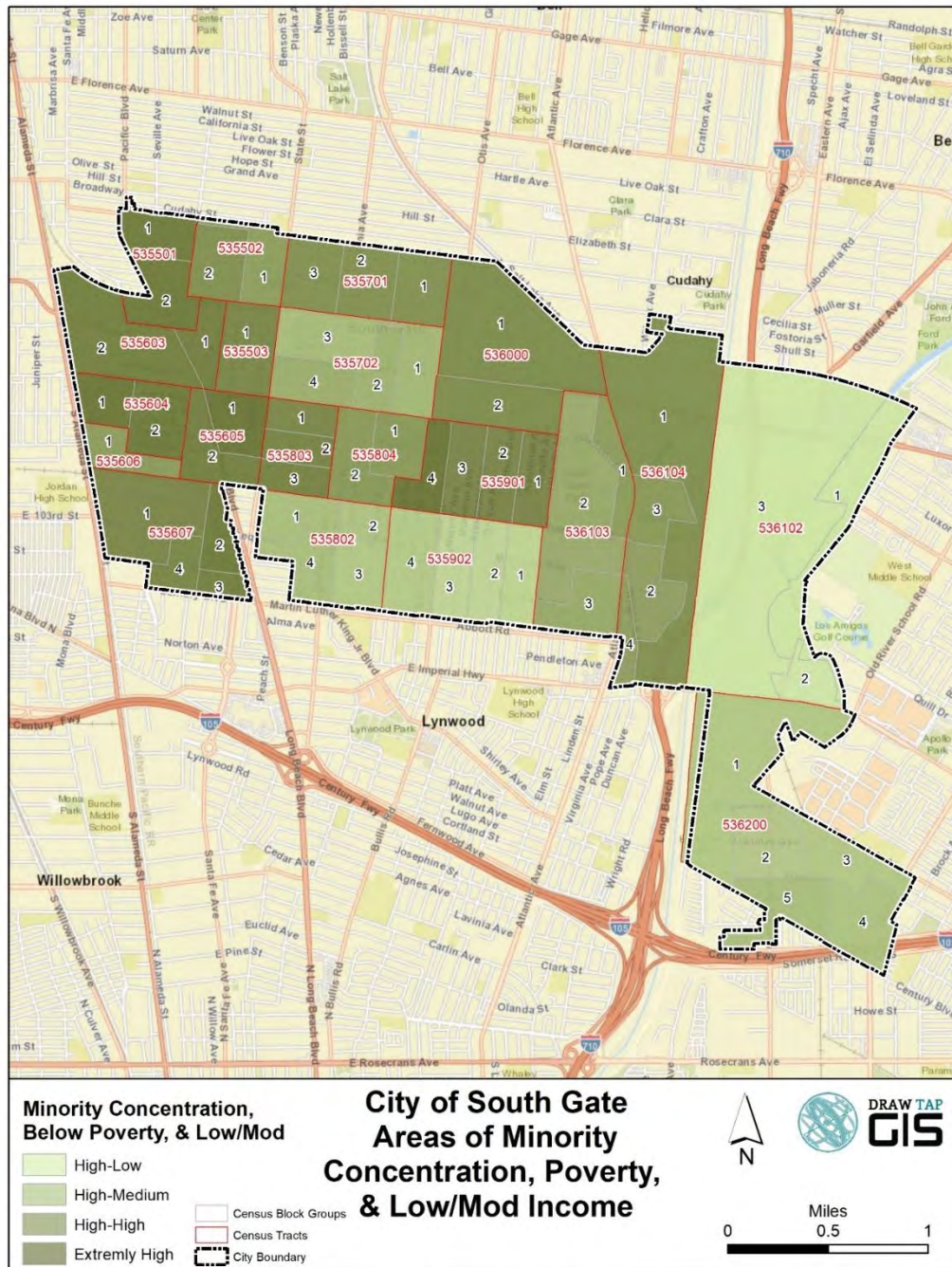
**Figure 4: Composite – Low Income/Poverty/Minority Concentrations**





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Source: 2014-2018 ACS



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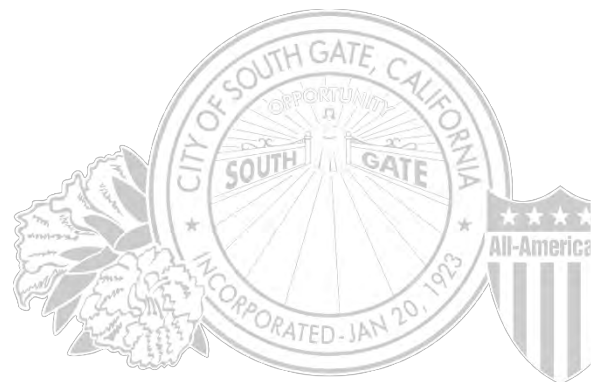
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Thank you for receiving and processing the City of South Gate's RHNA 6<sup>th</sup> Cycle Appeal. Should you have any questions regarding this matter please feel free to contact me at (323)563-9566 or padams@sogate.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul L. Adams'.

Paul L. Adams  
Interim Community Development Director  
City of South Gate



**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Ave  
Sacramento, CA 95833-1829  
916) 263-2911 FAX: (916) 263-7453  
www.hcd.ca.gov



December 10, 2020

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

Dear Executive Director Ajise:

**RE: Comment on Appeals of the Draft Regional Housing Need Allocation (RHNA) Plan**

Thank you for the opportunity to comment on the 52 appeals Southern California Association of Governments (SCAG) has received regarding the draft RHNA plan. The appeal process is an important phase in the development of a RHNA plan that ensures that all relevant factors and circumstances are considered.

The only circumstances under which a jurisdiction can appeal are:

- 65584.05(b)(1): The council of governments failed to adequately consider the information regarding the factors listed in subdivision (e) of section 65584.04.
- 65584.05(b)(2): The council of governments failed to determine the share of the regional housing need in a manner that furthers the intent of the objectives listed in subdivision (d) of section 65584.
- 65584.05(b)(3): A significant unforeseen change in circumstances occurred in the local jurisdiction that merits a revision of the information submitted pursuant to subdivision (e) of Section 65584.04.

The California Department of Housing and Community Development (HCD) urges SCAG to only consider appeals that meet these criteria.

Per Government Code section 65584.05(e)(1), SCAG's final determination on whether to accept, reject, or modify any appeal must be accompanied by written findings, including how the final determination is based upon the adopted RHNA allocation methodology, and how any revisions are necessary to further the statutory objectives of RHNA described in Government Code section 65584(d).

Among the appeals based on Government Code section 65584.05(b)(1), several appeals state that SCAG failed to consider the factor described in Government Code section 65584.04(e)(2)(B), citing the lack of land suitable for development as a basis for the appeal. However, this section states the council of governments may not limit its consideration of suitable housing sites to existing zoning and land use restrictions and must consider the potential for increased development under alternative zoning and

land use restrictions. Any comparable data or documentation supporting this appeal should contain an analysis of not only land suitable for urban development, but land for conversion to residential use, the availability of underutilized land, and opportunity for infill development and increased residential densities. In simple terms, this means housing planning cannot be limited to vacant land, and even communities that view themselves as built out must plan for housing through means such as rezoning commercial areas as mixed-use areas and upzoning non-vacant land.

With regard to appeals submitted related to Government Code section 65584.05(b)(2), that SCAG failed to determine the RHNA in a manner that furthers the statutory objectives, it should be noted that HCD reviewed SCAG's draft allocation methodology and found that the draft RHNA allocation methodology furthered the statutory objectives described in Government Code section 65584.

Among the appeals based on Government Code section 65584.05(b)(2), several contend that the cap on units allocated to extremely disadvantaged communities (DACs) does not further RHNA's statutory objectives. This cap furthers the statutory objective to affirmatively further fair housing by allocating more units to high opportunity areas and fewer units to low resource communities, and concentrated areas of poverty with high levels of segregation. Due to the inclusion of this factor, as well as the use of TCAC/HCD Opportunity Maps, SCAG's methodology allocates 14 of the top 15 highest shares of lower-income RHNA to jurisdictions with over 99.95 percent High and Highest Resource areas. With the exceptions of two jurisdictions, the 31 jurisdictions with the highest share of lower-income RHNA are all over 95 percent High and Highest Resource areas. Any weakening of these inputs to the methodology could risk not fulfilling the statutory objective to affirmatively further fair housing.

Several appeals argue that SCAG's RHNA allocation methodology does not adequately promote access to jobs and transit, as required in objectives two and three. HCD's review of SCAG's RHNA methodology found the allocation does further the environmental principles of objective two. SCAG's overall allocation includes significant weight related to the location of high-quality transit areas and the regional distribution of jobs that can be accessed within a 30-minute driving commutes. Regarding objective three, HCD's analysis as to whether jobs-housing fit was furthered by SCAG's draft methodology found that across all jurisdictions there is generally good alignment between low-wage jobs and lower-income RHNA, with all but 15 jurisdictions within a half percent plus or minus difference between their share of lower-income RHNA for the region and their percentage low-wage jobs for the region.

Several appeals are based upon the provision described in Government Code section 65584.05(b)(3), arguing that the COVID-19 pandemic represents a significant and unforeseen change in circumstances that will affect future population and job growth. Ensuring everyone has a home is critical to public health. Reducing and preventing overcrowding and homelessness are essential concerns for every community. The COVID-19 pandemic has only increased the importance that each community is planning for sufficient affordable housing.

Lastly, several appeals state that the Regional Housing Needs Determination (RHND) HCD provided to the SCAG region is too large. SCAG submitted an objection to the RHND at the appropriate time and through the appropriate process. HCD considered those objections and [determined the final RHND for 6<sup>th</sup> Housing Element Cycle for the SCAG region on October 15, 2019](#). There are no further appeal procedures available to alter the SCAG region's RHND for this cycle. Government Code section 65584.05(b) does not allow local governments to appeal the RHND during the 45-day period following receipt of the draft allocation.

HCD acknowledges that many local governments will need to plan for more housing than in the prior cycle to accommodate a RHND that more fully captures the housing need and as the statutory objectives of RHNA shift more housing planning near jobs, transit, and resources. The Southern California region's housing crisis requires each jurisdiction to plan for the housing needs of their community and the region. In recognition of this effort there are more resources available than ever before to support jurisdictions as they prepare to update their 6<sup>th</sup> cycle housing elements:

- SB 2 Planning Grants – \$123 million one-time allocation to cities and counties
- SB 2 Planning Grants Technical Assistance offered to all jurisdictions
- Regional and Local Early Action Planning Grants – \$238 million one-time allocation for local and regional governments
- SB 2 Permanent Local Housing Allocation – approximately \$175 million annually in ongoing funding for local governments to increase affordable housing stock

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Megan Kirkeby, Deputy Director, [megan.kirkeby@hcd.ca.gov](mailto:megan.kirkeby@hcd.ca.gov).



Megan Kirkeby  
Deputy Director



# City of Whittier

13230 Penn Street, Whittier, California 90602-1716  
(562) 567-9320 Fax (562) 567-2872 www.cityofwhittier.org

Electronically Transmitted to: [Housing@scag.ca.gov](mailto:Housing@scag.ca.gov)

December 10, 2020

RHNA Appeals Committee  
Southern California Association of Governments  
900 Wilshire Blvd, Suite 1700  
Los Angeles, CA 90017

**SUBJECT: City of Whittier's Comments on Appeals to the Sixth Cycle Regional Housing Needs Assessment (RHNA) Allocation**

Honorable Chair and Honorable Committee Members:

The City of Whittier ("City") appreciates the challenges that are inherent in allocating 1,341,827 housing units by the thousands (a 226% increase above the baseline 412,137 unit) to cities across Southern California, especially in built-out cities. However, the City is deeply concerned its housing allocation of 3,431 units from the State Department of Housing and Community Development ("HCD") and the Southern California Association of Government's ("SCAG") unit distribution methodology, along with recent housing legislation will fundamentally abridge the City's ability to develop effective land-use policies that are appropriate for managing the community's actual needs. The 878 units in the 5<sup>th</sup> cycle RHNA allocation has been increased by 290% to 3,431 units in the current 6<sup>th</sup> cycle. Particularly challenging in the 6<sup>th</sup> cycle, is the number of low and very low-income units (1,558) which combined with the moderate and above moderate unit totals forces unplanned and unnecessary residential densification of the community.

The affordable units are an unfunded mandate with very limited regional or State financial support for their development. Considering the affordable housing subsidies typically range from \$50,000 to \$250,000 per unit, the overall funding requirements could range from \$78,000,000 to \$390,000,000 which is clearly beyond the reach of the City of Whittier in that the City's general fund budget is just \$72,000,000 which already include \$2,000,000 annually to house the City's unsheltered residents in transitional housing. Additionally, the City only receives 7.5% of each property tax dollar to provide general services including police and library services.

The City is currently in the process of updating its Housing Element as well as the General Plan to incorporate the current RHNA allocation, so Whittier is acutely aware of the various housing needs as well as the potential obstacles, such as aging infrastructure and unplanned density, to creating the requisite housing within a city that

is essentially built out. The changes in the State's housing laws (SB 35, SB 166 and AB 1397) have created additional constraints for the agencies and may severely impact the City's ability to accomplish our regional and local housing goals.

Since development in Whittier began more than 130 years ago, the City is virtually built-out with little developable vacant land outside of its designated open space areas that are dedicated to accommodating existing and future residents. While the City has made significant efforts through its specific plans to densify existing corridors and districts, the majority of Whittier's remaining single-family residential neighborhoods cannot accommodate similar densification. Furthermore, the hills north of Whittier contain regional open space, sensitive habitat and wildlife areas that must be preserved in perpetuity. There are also significant infrastructure and water service constraints that impact Whittier's ability to produce significantly more housing. Although these facts may not be desirable, they must be pragmatically accounted for and mitigated by not further increasing Whittier's share of housing units contained in SCAG's 6<sup>th</sup> Cycle RHNA. The final RHNA allocation and methodology must be fair and equitable while reflecting the capacity for reasonable housing unit construction.

As with many other cities, the City is concerned about the current allocation, but an even greater concern is that additional units may be applied to the City if reallocated from cities that are successful in their appeals. To that end, the City believes the appeal process itself was unclear as to the potential ramifications to other cities and not fully understood.

Although we fully support the surrounding cities in their appeals, the potential for additional units being applied to the City would exacerbate the problems described herein and in Whittier's September 13, 2019 letter to SCAG.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Jeffery S. Adams  
Director of Community Development

File

**From:** Christopher Koontz <Christopher.Koontz@longbeach.gov>  
**Sent:** Thursday, December 3, 2020 11:14 AM  
**To:** Regional Housing  
**Subject:** RHNA Appeals

**Categories:** Response Required, Record

Good morning,

The purpose of this email is to provide the City of Long Beach’s position in regards to pending RHNA appeals before SCAG. The City of Long Beach seeks to meet its housing needs and obligations for the benefit of Long Beach residents and the region. Our allocation was extremely large and presents a planning and financing challenge for the City. Nonetheless we chose not to appeal our allocation because the allocation process was fair and transparent including taking the City of Long Beach’s input into consideration.

We oppose and will not accept any transfer of additional allocation due to the pending appeals. We note that within our area, the Gateway COG, appeals are pending from Bellflower, Cerritos, Downey, Huntington Park, La Mirada, Lakewood, Pico Rivera, and South Gate. Each of these appeals should be evaluated by SCAG on the merits, however Long Beach opposes any transfer of allocation to our City. It would be inappropriate to transfer a further burden to Long Beach when we have already accepted a large allocation and have done more than many cities in the region to accommodate housing growth under the current RHNA cycle, including fully meeting our market-rate RHNA allocation.

The City of Long Beach will continue to work with SCAG and our neighbor jurisdictions to address the housing needs of our residents.

We thank you for consideration and please do not hesitate to contact the City regarding our position.

Christopher Koontz, AICP  
*Deputy Director*

Development Services  
411 W. Ocean Blvd., 3rd Floor | Long Beach, CA 90802  
Office: 562.570.6288 | Fax: 562.570.6068



Attachment: Comments Received During the Comment Period (General) (Appeal of the Draft RHNA Allocation for the City of South Gate)





Southern California Association of Governments  
Remote Participation Only  
January 8, 2021

**To:** Regional Housing Needs Assessment Subcommittee (RHNA)

**EXECUTIVE DIRECTOR'S  
APPROVAL**

**From:** Karen Calderon, Associate Regional Planner,  
(213) 236-1983, calderon@scag.ca.gov

**Subject:** Appeal of the Draft RHNA Allocation for the City of Bellflower

**RECOMMENDED ACTION:**

Deny the appeal filed by the City of Bellflower (City) to reduce the Draft RHNA Allocation for the City by 2,726 units.

**STRATEGIC PLAN:**

This item supports the following Strategic Plan Goal 2: Advance Southern California’s policy interests and planning priorities through regional, statewide, and national engagement and advocacy.

**SUMMARY OF APPEAL:**

The City of Bellflower requests a reduction of its RHNA allocation [by 2,726 units (from 3,726 units to 1,000 units)] based on the following issues:

1. Existing or projected jobs-housing balance - adding housing would exacerbate the existing job/housing imbalance (sufficient housing but insufficient jobs) forcing residents to commute to jobs outside of the City.
2. Sewer or water infrastructure constraints - water and sewer providers might not have the capacity to accommodate the City’s expected growth in addition to the growth of neighboring cities without additional infrastructure.
3. The region’s greenhouse gas emissions targets - implementing their RHNA allocation would prevent the City from achieving the GHG emission targets established by the City’s Climate Action Plan.

**RATIONALE FOR STAFF RECOMMENDATION:**

Staff have reviewed the appeal and recommend no change to the City of Bellflower’s RHNA allocation. SCAG’s final RHNA methodology already accounts for the issue raised in Issue 1. Based on Issue 2, evidence from a utility service provider that would preclude the construction of new housing was not demonstrated and costs to upgrade and develop appropriate infrastructure cannot be considered by SCAG as a justification for a reduction. Based on Issue 3, the statutory objective of

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*To foster innovative regional solutions that improve the lives of Southern Californians through inclusive collaboration, visionary planning, regional advocacy, information sharing, and promoting best practices.*

**OUR VISION**

*Southern California’s Catalyst for a Brighter Future*

**OUR CORE VALUES**

*Be Open | Lead by Example | Make an Impact | Be Courageous*

RHNA is to promote the achievement of the region's GHG emissions targets as specified by ARB (Government Code 65584(e)). Since Connect SoCal's modeling of regional travel indicates that Bellflower is one of the best places in the region to access jobs, increased housing stock in Bellflower (compared to elsewhere) would reduce regional GHG emissions.

## **BACKGROUND:**

### **Draft RHNA Allocation**

Following the adoption of the Final RHNA Methodology on March 5, 2020 and the adoption of Connect SoCal on September 3, 2020, all local jurisdictions received draft RHNA allocations on September 11, 2020. A summary is below.

#### **Total RHNA for the City of Bellflower: 3,726 units**

Very Low Income: 1,012 units

Low Income: 487 units

Moderate Income: 552 units

Above Moderate Income: 1,675 units

Additional background related to the Draft RHNA Allocation is included in Attachment 1.

### **Summary of Comments Received during 45-day Comment Period**

No comments were received from local jurisdictions or HCD during the 45-day public comment period described in Government Code section 65584.05(c) which specifically regard the appeal filed for the City of Bellflower. Three comments were received which relate to appeals filed generally:

- HCD submitted a comment on December 10, 2020 delineating the statutory basis for RHNA appeals and the requirement that any appeals granted must include written findings regarding how revisions are necessary to further RHNA's statutory objectives.
- The City of Whittier submitted a comment on December 10, 2020 supporting surrounding cities in their appeals but expressing concern that additional units may be applied to Whittier if reallocated from cities which are successful in their appeals.
- The City of Long Beach submitted a comment on December 3, 2020 indicating their view that the RHNA allocation process was fair and transparent, their support for evaluating appeals on their merits (specifically those from the Gateway Council of Governments), and their opposition to any action which would result in a transfer of additional units to Long Beach.

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**ANALYSIS:*****Issue 1: Existing or projected jobs-housing balance [Government Code Section 65584.04(e)(1)].***

*The City argues that an excessive RHNA allocation will exacerbate the job/housing imbalance the jurisdiction is experiencing. The City calculates Bellflower's job to housing ratio to be 0.27 demonstrating sufficient housing but insufficient jobs, which will force residents to commute to jobs outside of the city. Adding the 3,726 RHNA units would result in a job/housing ration of 0.24 and exacerbate the jobs/housing imbalance in the City and region. The loss of jobs will be further worsened by COVID-19.*

**SCAG Staff Response:** The adopted RHNA methodology includes a calculation of job accessibility as one of the factors to determine a jurisdiction's draft RHNA allocation. Job accessibility is defined as the jurisdiction's share of regional jobs accessible within a 30-minute commute (additional details are found in the adopted RHNA methodology). This is not a measure of the number of jobs within a jurisdiction; rather, it is a measure of how many jobs can be accessed by a jurisdiction's residents, which can include jobs located outside of the jurisdiction. Over 80 percent of SCAG region workers live and work in different jurisdictions, which calls for an approach to the region's job housing relationship through the measurement of access rather than number of jobs within a certain jurisdiction. As described in Attachment 1, from the City of Bellflower's median TAZ, it will be possible to reach 22.44% of the region's jobs in 2045 within a 30-minute automobile commute (2,255,000 jobs, based on Connect SoCal's 2045 regional job forecast of 10,049,000 jobs). In fact, Bellflower ranks #2 out of 197 SCAG jurisdictions in job accessibility, second only to the City of Commerce (23.31%). While we understand that the city's jobs housing ratio indicates that there are more housing units than jobs in Bellflower, it remains one of the best cities in the region for accessing jobs within a short commute which are in neighboring jurisdictions. See Attachment 2, Map of Job Accessibility in the City of Bellflower. Limiting a jobs housing balance assessment solely within jurisdictions can effectively worsen a regional jobs housing balance, and thus, SCAG staff does not recommend a reduction to the jurisdiction's draft RHNA allocation based on this factor.

***Issue 2: Sewer or water infrastructure constraints for additional development [Government Code Section 65584.04(e)(2)(A)].***

*The City calculates that the water and sewer services required to accommodate their RHNA allocation of 3,726 units equates to 655,778 gallons per day for water and 2,235,600 gallons per day of sewer flows. Water and sewer providers might not have the capacity to accommodate this growth in addition to the growth of neighboring cities without additional infrastructure. Therefore, reducing the City's RHNA allocation would reduce the service demand on water and service providers.*

**SCAG Staff Response:** For Government Code Section 65584.04(e)(2)(A) to apply in this case, the jurisdiction must be precluded from providing necessary infrastructure for additional development due to supply and distribution decisions made by a sewer or water provider other than the local jurisdiction. For the water constraints mentioned by the jurisdiction, it is not evident that the respective water providers have rendered a decision that would prevent the jurisdiction from providing the necessary infrastructure. Costs to upgrade and develop appropriate infrastructure cannot be considered by SCAG as a justification for a reduction since the RHNA allocation is not a building quota. Rather, a jurisdiction is required to plan and zone for housing need and is not penalized for not developing the assigned units. For this reason, SCAG staff does not recommend a housing need reduction based upon this planning factor.

**Issue 3:** The region's greenhouse gas emissions targets [Government Code Section 65584.04(e)(12)].

*The City argues a RHNA allocation of 3,726 new units would prevent the City from achieving the GHG emission targets established by the City's Climate Action Plan (CAP), focusing on the year 2030 and the goal of a 38% reduction by 2030. Using a California Air Pollution Control Officers Association (CAPCOA) formula (900 MT CO<sub>2</sub>E/50 unit/year), the City calculates 3,726 new units would result in 67,068 MT/year, thus exceeding the City's GHG significance threshold of 25,000 MT CO<sub>2</sub>E/year. This would jeopardize the City's ability to achieve the CAP 2030 GHG emission target and increase harmful air pollutants and energy demand/costs.*

**SCAG Staff Response:** SCAG recognizes the forward-thinking planning of Bellflower's CAP and applauds the City's commitment to GHG reduction. However, while jurisdiction-level GHG reduction efforts are laudable, the statutory objective of RHNA is to promote the achievement of the region's GHG emissions targets as specified by ARB (Government Code § 65584(d)(2)).

Data from Connect SoCal (SCAG's 2020 Regional Transportation Plan and Sustainable Community Strategy) was used to inform how the RHNA methodology furthers this objective. The majority of Bellflower's RHNA allocation stems from its location near future employment. As aforementioned, the median Bellflower resident in 2045 can expect to be able to reach 2,255,000 jobs within a 30-minute drive, which is the second-highest in the region. Since approximately 37% of statewide greenhouse gas emissions are from transportation sources and 21% of travel is job/commute related, additional residential development in places which score high on this measure is a crucial tool toward reducing regional GHG emissions.

The City uses the CAPCOA's CEQA & Climate Change White Paper emissions estimate of 900 metric tons of CO<sub>2</sub> per 50 residential units in order to determine a significant impact. However, CAPCOA's estimate is a suggested threshold that uses single-family housing as a basis and does not consider a wide variety of residential types and development sizes. In fact, on page 43 of CAPCOA's white paper, they state: "if this threshold is preferred, it is suggested that a more robust data set be

examined to increase the representativeness of the selected thresholds.”<sup>1</sup> Furthermore, it is not clear whether this estimate takes into account the proximity of housing with respect to transit and jobs.

Connect SoCal specifically provides a regional plan to reduce travel-related GHG emissions by employing land use policies at the regional level. While SCAG acknowledges that 3,726 new units could increase GHG emissions in the City, planning for this development in a manner that is consistent with the development patterns in Connect SoCal would reduce region-wide GHG impacts by placing these units in areas that are close to jobs and transit. In addition, HCD’s regional determination is based in large part on measures of existing need (e.g. overcrowding) rather than regional population growth; as such much of the RHNA allocation intends to accommodate current population. Since Connect SoCal’s modeling of regional travel indicates that Bellflower is one of the best places in the region to access jobs, increased housing stock in Bellflower (compared to elsewhere) would improve regional GHG which is a statutory objective of RHNA. For this reason, SCAG staff does not recommend a reduction to Bellflower’s draft RHNA allocation based on this factor.

**FISCAL IMPACT:**

Work associated with this item is included in the current FY20-21 Overall Work Program (300-4872Y0.02: Regional Housing Needs Assessment).

**ATTACHMENT(S):**

1. Local Input and Development of Draft RHNA Allocation (City of Bellflower)
2. Map of Job Accessibility in the City of Bellflower
3. Appeal and Supporting Documentation (City of Bellflower)
4. Comments Received During the Comment Period (General)

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<sup>1</sup> CAPCOA, January 2008. CEQA & Climate Change. Available at: <http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA-White-Paper.pdf>

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### **Attachment 1: Local Input and Development of Draft RHNA Allocation**

This attachment sets forth the nature and timing of the opportunities which the City of Bellflower had to provide information and local input on SCAG's growth forecast, the RHNA methodology, and the Growth Vision of the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). It also describes how the RHNA Methodology development process integrates this information in order to develop the City of Bellflower Draft RHNA Allocation.

#### **1. Local Input**

##### ***a. Bottom-Up Local Input and Envisioning Process***

On October 31, 2017, SCAG took the first step toward developing draft RHNA allocations by initiating the Bottom-Up Local Input and Envisioning Process. At the direction of the Regional Council, the objective of this process was to seek local input and data to prepare for the 2020 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS or Connect SoCal) and the 6<sup>th</sup> cycle of RHNA.<sup>1</sup> Each jurisdiction was provided with a package of land use, transportation, environmental, and growth forecast data for review and revision which was due on October 1, 2018.<sup>2</sup> While the local input process materials focus principally on jurisdiction-level and Transportation Analysis Zone (TAZ) level growth, input on specific parcels, sites, and project areas were welcomed and integrated into SCAG's growth forecast as well as data on other elements. SCAG met one-on-one with all 197 local jurisdictions between November 2017 and July 2018 and provided training opportunities and staff support. Following input from SCAG's Technical Working Group (TWG), the Connect SoCal growth forecast reflected precisely the jurisdiction-level growth totals provided during this process.

The local input data included SCAG's preliminary growth forecast information. For the City of Bellflower, the anticipated number of households in 2020 was 23,448 and in 2030 was 23,820 (growth of 372 households). In May 2018, SCAG staff met with local jurisdiction staff to discuss the Bottom-Up Local Input and Envisioning Process and answer questions. Input from the City of Bellflower on the growth forecast was received in October 2018. Following input, household totals were 23,269 in

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<sup>1</sup> While the RTP/SCS and RHNA share data elements, they are distinct processes. The RTP/SCS growth forecast provides an assessment of reasonably foreseeable future patterns of employment, population, and household growth in the region given demographic and economic trends, and existing local and regional policy priorities. The RHNA identifies anticipated housing need over a specified eight-year period and requires that local jurisdictions make available sufficient zoned capacity to accommodate this need. A further discussion of the relationship between these processes can be found in Connect SoCal Master Response 1 at [https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal\\_Public-Participation-Appendix-2.pdf](https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal_Public-Participation-Appendix-2.pdf).

<sup>2</sup> A detailed list of data during this process reviewed can be found in each jurisdiction's Draft Data/Map Book at <http://scagrtpscsc.net/Pages/DataMapBooks.aspx>

2020 and 23,306 in 2030 (growth of 37 households), for a reduced household growth during this period of 335 from preliminary growth forecast data.

**b. RHNA Methodology Surveys**

On March 19, 2019, SCAG distributed a packet of methodology surveys, which included the local planning factor survey (formerly known as the AB2158 factor survey), Affirmatively Furthering Fair Housing (AFFH) survey, and replacement need survey, to SCAG jurisdictions’ Community Development Directors. Surveys were due on April 30, 2019. SCAG reviewed all submitted responses as part of the development of the Draft RHNA Methodology. The City of Bellflower submitted the following surveys prior to the adoption of the Draft RHNA Methodology:

- Local planning factor survey
- Affirmatively Furthering Fair Housing (AFFH) survey
- Replacement need survey
- No survey was submitted to SCAG

**c. Connect SoCal Growth Vision and Additional Refinements**

Beginning in May 2018, SCAG’s Sustainable Communities Working Group began the process of developing growth scenarios for the SCAG region. The culmination of this work was the development of the Connect SoCal Growth Vision, which directly uses jurisdictional-level growth projections from the Bottom-Up Local Input and Envisioning process, and also features strategies for growth at the TAZ-level that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California’s GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Additional detail regarding the Connect SoCal Growth Vision, specifically the Transportation Analysis Zone (TAZ, or neighborhood) level projections is found at <https://www.connectsocal.org/Documents/DataMapBooks/Growth-Vision-Methodology.pdf>. As a result of these strategies, in some jurisdictions growth at the TAZ-level differed from locally anticipated growth conveyed during the Bottom-Up Local Input and Envisioning Process.

As such, SCAG provided two additional opportunities for all local jurisdictions to make TAZ-level technical refinements on the topics of general plan capacities and entitlements. During the release of the draft Connect SoCal Plan, jurisdictions were notified on October 31, 2019 that SCAG would accept additional refinements until December 11, 2019. Following the Regional Council’s decision to delay full adoption of Connect SoCal for 120 days due to the Covid-19 pandemic, all jurisdictions were again notified on May 26, 2020 that SCAG would accept additional refinements until June 9, 2020.

Connect SoCal Growth Vision data have been available to local jurisdiction staff during the entirety of this process through SCAG’s Scenario Planning Model Data Management Site (SPM-DM) at <http://spmdm.scag.ca.gov>. and updates were shared with local jurisdictions on technical refinements to the data in February 2020 and August 2020 to share the results of both review opportunities.

SCAG did not receive additional technical corrections from the City of Bellflower from which differed from the Growth Vision.

## 2. Development of the Final RHNA Methodology

SCAG convened the first meeting of the RHNA Subcommittee in October 2018. In their subsequent monthly meetings, this body reviewed and advised on the development of SCAG's 6<sup>th</sup> cycle RHNA process, including the development of the RHNA methodology. Per Government Code 65584.04(a), SCAG must develop a RHNA methodology which furthers the five statutory objectives of RHNA:

*(1) Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households.*

*(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.*

*(3) Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.*

*(4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.*

*(5) Affirmatively furthering fair housing (Govt. Code § 65584(d)).*

As explained in more detail below, the Draft RHNA Methodology (which was adopted as the Final RHNA Methodology) set forth the policy factors, data sources, and calculations which would be used to generate draft RHNA allocations for all local jurisdictions. Following extensive debate and public comment, SCAG's Regional Council voted to approve the Draft RHNA Methodology on November 7, 2019 and provide it to HCD for review. Per Government Code 65584.04(i), HCD is vested with the authority to determine whether a methodology furthers the objectives set forth in Government Code section 65584(d). On January 13, 2020, HCD found that the Draft RHNA Methodology furthers these five statutory objectives of RHNA. Specifically, HCD noted that:

*"This methodology generally distributes more RHNA, particularly lower income RHNA, near jobs, transit, and resources linked to long term improvements of life outcomes. In particular, HCD applauds the use of the objective factors specifically linked the statutory objectives in the existing need methodology." (Letter from HCD to SCAG*



*dated January 13, 2020 at <https://scag.ca.gov/sites/main/files/file-attachments/hcd-review-rc-approved-draft-rhna-methodology.pdf?1602190239>).*

On March 5, 2020, again following extensive debate and public comment, the Regional Council voted to approve the Draft RHNA Methodology as the Final RHNA Methodology. Unlike SCAG's 5<sup>th</sup> cycle RHNA methodology which relies almost entirely on the household growth component of the RTP/SCS, SCAG's 6<sup>th</sup> cycle RHNA methodology consists of two primary elements: "projected need" which includes the number of housing units required to accommodate anticipated population growth over the 8-year RHNA planning period and "existing need," which refers to the number of housing units required to accommodate excess or unsatisfied housing demand experienced by the region's current population.<sup>3</sup> Furthermore, the Final RHNA methodology utilizes measures of 2045 job accessibility and High Quality Transit Area (HQTA) population measures based on TAZ-level projections in the Connect SoCal Growth Vision.

More specifically, the Final RHNA Methodology considers three primary factors in determining a local jurisdiction's total housing need which are primarily based on data from Connect SoCal's aforementioned Bottom-Up Local Input and Envisioning Process:

- Forecasted growth over 2020-2030 (projected need)
- Transit accessibility in 2045 (existing need)
- Job accessibility in 2045 (existing need)

The methodology is described in further detail at:

<http://scag.ca.gov/programs/Documents/RHNA/SCAG-Final-RHNA-Methodology-030520.pdf>.

### **3. Draft RHNA Allocation for the City of Bellflower**

Following the adoption of the Final RHNA Methodology on March 5, 2020 and the 120 day delay due to the Covid-19 pandemic, SCAG adopted Connect SoCal on September 3, 2020, and the City of Bellflower received its draft RHNA allocation on September 11, 2020. Application of the RHNA methodology yields the draft RHNA allocation for the City of Bellflower as summarized in the data and calculations in the tables below.

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<sup>3</sup> Legislative changes in 2018 modified the nature of the regional housing need determination for the 6<sup>th</sup> cycle of RHNA by adding measures of household overcrowding and housing cost burden to the list of factors to be considered by HCD for the determination of housing need. These new measures are not included in the Connect SoCal Growth Forecast because they are not direct inputs to the growth forecasting process and are independent of employment and population projections. In contrast, they reflect additional latent housing needs in the current population (i.e. "existing need") and would not result in a change in regional population. For further discussion see Connect SoCal Master Response 1 at [https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal\\_Public-Participation-Appendix-2.pdf](https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal_Public-Participation-Appendix-2.pdf).

| Bellflower city statistics and inputs:   |           |
|--|-----------|
| Forecasted household (HH) growth, RHNA period:<br><i>(2020-2030 Household Growth * 0.825)</i>  | 31        |
| Percent of households who are renting:   | 60%       |
| Housing unit loss from demolition (2009-18):   | 62        |
| Adjusted forecasted household growth, 2020-2045:<br><i>(Local input growth forecast total adjusted by the difference between the RHNA determination and SCAG's regional 2020-2045 forecast, +4%)</i> | 162       |
| Percent of regional jobs accessible in 30 mins (2045):<br><i>(For the jurisdiction's median TAZ)</i>   | 22.44%    |
| Jobs accessible from the jurisdiction's median TAZ (2045):<br><i>(Based on Connect SoCal's 2045 regional forecast of 10.049M jobs)</i>   | 2,255,000 |
| Share of region's job accessibility (population weighted):   | 0.63%     |
| Jurisdiction's HQTAs population (2045):  | 16,253    |
| Share of region's HQTAs population (2045):   | 0.16%     |
| Share of population in low/very low-resource tracts:   | 31.70%    |
| Share of population in very high-resource tracts:  | 0.00%     |
| Social equity adjustment:  | 150%      |

| Calculation of Draft RHNA Allocation for Bellflower city  |             |
|---|-------------|
| Forecasted household (HH) growth, RHNA period:  | 31          |
| Vacancy Adjustment<br><i>(5% for renter households and 1.5% for owner households)</i>   | 1           |
| Replacement Need  | 62          |
| <b>TOTAL PROJECTED NEED:</b>  | <b>94</b>   |
| Existing need due to job accessibility (50%)  | 2654        |
| Existing need due to HQTAs pop. share (50%)   | 665         |
| Net residual factor for existing need<br><i>(Negative values reflect a cap on lower-resourced community with good job and/or transit access. Positive values represent this amount being redistributed to higher-resourced communities based on their job and/or transit access.)</i> | 314         |
| <b>TOTAL EXISTING NEED</b>  | <b>3632</b> |
| <b>TOTAL RHNA FOR BELLFLOWER CITY</b>   | <b>3726</b> |
| Very-low income (<50% of AMI)   | 1012        |
| Low income (50-80% of AMI)  | 487         |
| Moderate income (80-120% of AMI)  | 552         |
| Above moderate income (>120% of AMI)  | 1675        |

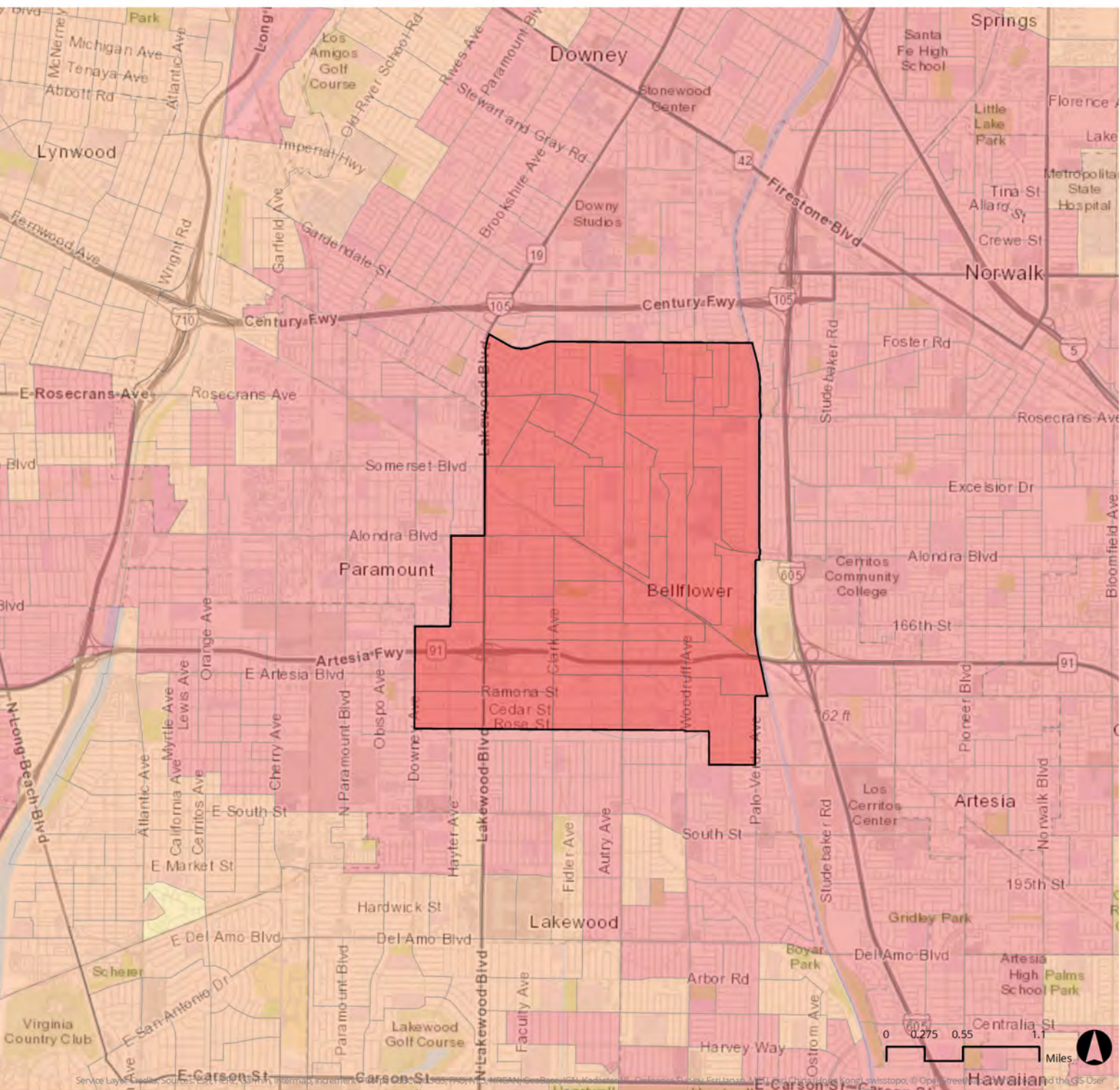
The transit accessibility measure is based on the population anticipated to live in High-Quality Transit Areas (HQTAs) in 2045 based on Connect SoCal's designation of high-quality transit areas and population forecasts. With a forecasted 2045 population of 16,253 living within HQTAs, the City of Bellflower represents 0.16% of the SCAG region's HQTAs population, which is the basis for allocating housing units based on transit accessibility.

Job accessibility is defined as the jurisdiction's share of regional jobs accessible within a 30-minute drive commute. Since over 80 percent of the region's workers live and work in different jurisdictions, the RHNA methodology uses a measure based on Connect SoCal's travel demand model output for the year 2045 rather than assigning housing units based on the number of jobs with a specific jurisdiction. Specifically, the share of future (2045) regional jobs which can be reached in a 30-minute automobile commute from the local jurisdiction's median TAZ is used as to allocate housing units based on transit accessibility. From the City of Bellflower's median TAZ, it will be possible to reach 22.44% of the region's jobs in 2045 within a 30-minute automobile commute (2,255,000 jobs, based on Connect SoCal's 2045 regional job forecast of 10,049,000 jobs).

An additional factor is included in the methodology to account for RHNA Objective #5 to Affirmatively Further Fair Housing (AFFH). Several jurisdictions in the region which are considered disadvantaged communities (DACs) on the basis of access to opportunity measures (described further in the RHNA methodology document), but which also score highly in job and transit access, may have their total

RHNA allocations capped based on their long-range (2045) household forecast. This additional housing need, referred to as residual, is then reallocated to non-DAC jurisdictions in order to ensure housing units are placed in higher-resourced communities consistent with AFFH principles. This reallocation is based on the job and transit access measures described above, and results in an additional 314 units assigned to the City of Bellflower.

Please note that the above represents only a partial description of key data and calculations in the RHNA methodology.



## TAZ-level job accessibility in and around: City of Bellflower [Year 2045]



Note: These data represent the share of jobs in the SCAG region accessible by automobile commute in 30 minutes in 2045 during the peak AM commute (6-9am). Further detail on the job accessibility measure can be found in SCAG's Final RHNA Methodology. Note that since the SCAG region's total employment forecast for 2045 is 10,049,000 jobs, the number of jobs available can be measured by multiplying the percentage found on the map by this number. For example, a TAZ-level job accessibility measure of 10.0% means that 1,049,000 future jobs could be reached in 30 minutes.

Data Source: SCAG, 2020 | Map Created: 10/22/2020

Disclaimer: The data underlying the information shown on this map reflect jurisdiction's input submitted during the Local Input and Envision Connect SoCal. SCAG shall not be responsible for user's misuse or misrepresentation of this map. For the details regarding the sources, methodology of this map, please refer to the SCAG Data/Map Book at <https://www.connectsocial.org/Pages/Local-Input-Process.aspx> or contact [RTPLocal@scag.org](mailto:RTPLocal@scag.org)

**Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form**  
*All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.*  
*Appeals and supporting documentation should be submitted to [housing@scaq.ca.gov](mailto:housing@scaq.ca.gov).*  
*Late submissions will not be accepted.*

Date: 10/26/20 Jurisdiction Subject to This Appeal Filing: SCAG, City of Bellflower  
*(to file another appeal, please use another form)*

Filing Party (Jurisdiction or HCD) City of Bellflower

Filing Party Contact Name Elizabeth Corpuz, Planning Director Filing Party Email: ecorpuz@bellflower.org

**APPEAL AUTHORIZED BY:**

Name: Jeffrey L. Stewart

**PLEASE SELECT BELOW:**

- Mayor
- Chief Administrative Office
- City Manager
- Chair of County Board of Supervisors
- Planning Director
- Other: \_\_\_\_\_

**BASES FOR APPEAL**

- Application of the adopted Final RHNA Methodology for the 6<sup>th</sup> Cycle RHNA (2021-2029)
- Local Planning Factors and/or Information Related to Affirmatively Furthering Fair Housing (See Government Code Section 65584.04 (b)(2) and (e))
  - Existing or projected jobs-housing balance
  - Sewer or water infrastructure constraints for additional development
  - Availability of land suitable for urban development or for conversion to residential use
  - Lands protected from urban development under existing federal or state programs
  - County policies to preserve prime agricultural land
  - Distribution of household growth assumed for purposes of comparable Regional Transportation Plans
  - County-city agreements to direct growth toward incorporated areas of County
  - Loss of units contained in assisted housing developments
  - High housing cost burdens
  - The rate of overcrowding
  - Housing needs of farmworkers
  - Housing needs generated by the presence of a university campus within a jurisdiction
  - Loss of units during a state of emergency
  - The region's greenhouse gas emissions targets
  - Affirmatively furthering fair housing
- Changed Circumstances (Per Government Code Section 65584.05(b), appeals based on change of circumstance can only be made by the jurisdiction or jurisdictions where the change in circumstance occurred)

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_ Hearing Date: \_\_\_\_\_ Planner: \_\_\_\_\_

**Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form**  
*All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.*  
*Appeals and supporting documentation should be submitted to [housing@scaq.ca.gov](mailto:housing@scaq.ca.gov).*  
*Late submissions will not be accepted.*

**Brief statement on why this revision is necessary to further the intent of the objectives listed in Government Code Section 65584 (please refer to Exhibit C of the Appeals Guidelines):**

**Please include supporting documentation for evidence as needed, and attach additional pages if you need more room.**

Section 65584 states that the City “should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” However, SCAG has failed to consider information relating to certain local factors, as outlined in Government Code Section 65584.04(e), relating to affirmatively furthering fair housing pursuant to Government Code Sections 65584.04(b)(2) and 65584(d)(5). These factors relate to: (1) Jobs/Housing Imbalance; (2) Lack of necessary infrastructure and utilities; and (3) Increased Greenhouse Gas Emissions. Please note that these local factors are consistent with the development pattern described in the sustainable communities strategy of SCAG’s “Connect SoCal Plan”, as required by Government Code Section 65080(b)(2). SCAG’s failure to consider these foregoing factors, prevent the City from realistically and economically facilitate future construction of residential units, thus, impeding the “affirmative furthering of fair housing” in the City and region. Please refer to attached Appeal Letter.

**Brief Description of Appeal Request and Desired Outcome:**

The City of Bellflower believes that the additional 3,726 new residential units being assigned by SCAG is excessive and will have long-term negative impacts to the City’s economic vitality and overall health; will intensify the City’s and region’s jobs/housing imbalance; will burden those utility agencies’ ability to provide sufficient water and sewer services to the City; and will prevent the City from achieving those GHG emission targets established by the City’s Climate Action Plan. Accordingly, the City urges SCAG to consider reducing Bellflower’s RHNA allocated units from 3,726 to 1,000 units.

**Number of units requested to be reduced or added to the jurisdiction’s draft RHNA allocation (circle one):**

Reduced 2,726                      Added \_\_\_\_\_

**List of Supporting Documentation, by Title and Number of Pages**  
**(Numbers may be continued to accommodate additional supporting documentation):**

1. City of Bellflower Appeal of 6th Cycle RHNA, October 26, 2020 (4 pages)
- 2.
- 3.

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_ Hearing Date: \_\_\_\_\_ Planner: \_\_\_\_\_

# The City of Bellflower

*Families. Businesses. Futures.*

16600 Civic Center Drive, Bellflower, CA 90706

Tel 562.804.1424 Fax 562.925.8660 www.bellflower.org



October 26, 2020

VIA E-MAIL  
housing@scag.ca.gov

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

**SUBJECT: Appeal of 6th Cycle Regional Housing Needs Assessment (RHNA) Allocation for City of Bellflower**

Dear Mr. Ajise:

The City of Bellflower requests that Southern California Association of Governments (SCAG) reduce the number of RHNA allocated share that have been assigned to the City. At its September 3, 2020 Regional Council Meeting, SCAG announced that the City of Bellflower was required to provide 3,726 additional residential units to help the State achieve its RHNA target for the 6<sup>th</sup> Cycle. The City of Bellflower believes the additional 3,726 residential units represents an excessive increase, especially when considering that the City's RHNA unit obligation for the 5<sup>th</sup> Cycle was only two units (one low-income unit and one very low-income unit). Therefore, the 3,726 residential units now being assigned to the City is an increase of 186,200% more than the 5<sup>th</sup> Cycle. Accordingly, the City urges SCAG to consider reducing Bellflower's RHNA allocation from 3,726 to 1,000 units, which represents a decrease of 73 percent.

In accordance with Government Code Section 65584.04, this letter is appealing SCAG's calculation of Bellflower's RHNA allocated share because these excessive number of units would prevent Bellflower from complying with those objectives listed in Government Code Section 65584. Section 65584 states that the City "should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes." However, SCAG has failed to consider information relating to certain local factors, as outlined in Government Code Section 65584.04(e), relating to affirmatively furthering fair housing pursuant to Government Code Sections 65584.04(b)(2) and 65584(d)(5). These factors relate to: (1) Jobs/Housing Imbalance; (2) Lack of necessary infrastructure and utilities; and (3) Increased Greenhouse Gas Emissions. Please note that these local factors are consistent with the development pattern described in the sustainable communities strategy of SCAG's "Connect SoCal Plan", as required by Government Code Section 65080(b)(2). SCAG's failure to consider these foregoing factors, prevent the City from realistically and economically facilitate future construction of residential units, thus, impeding the "affirmative furthering of fair housing" in the City and region.

The following explains why the 3,726 RHNA unit obligation is considered excessive and unachievable, based on each of the aforementioned local factors.

**1. The Excessive RHNA Unit Obligation Will Create Regional Jobs/Housing Imbalance**

The document entitled, "The New Economy and Jobs/Housing Balance in Southern California", prepared by SCAG, in April 2001, indicated that Bellflower in 1997, had a population of 66,250 people; 23,123 households; and 16,198 jobs. The jobs/housing balance ratio was calculated to be 0.70 in 1997. Updated figures now show that the City had a 2015 population of 78,106 people (an increase of 18%) and 24,897 households (an increase of 8%), and 6,767 jobs (a reduction of 58%). The job/housing balance ratio was calculated to be 0.27, based on current census and building permit data.

The 2001 SCAG document indicated a job/housing ratio of 1.0 to 1.29 would be considered balanced. Another document entitled, "Jobs-Housing Balance in Egooods in Southern California", prepared by UCI School of Social Ecology in January 2017 indicated that a 1.0 ratio would be considered balanced, while any other ratio would be imbalanced. Therefore, the 0.70 ratio from 1997 and the 0.27 ratio from current data showed that the City is already highly imbalanced and is housing-rich but jobs-poor.

When adding the 3,726 RHNA units to the 2015 totals, the City's housing stock will be increased by 15% (based on an estimated existing [2020] 25,000 units) and would have a jobs/housing ratio of 0.24, which supports the City's conclusion that the additional RHNA units will exacerbate and worsen the jobs/housing imbalance in the City and region. The City and region will continue to be substantially housing-rich, but with limited job opportunities to support the increased housing. SCAG's intention to increase future housing will only worsen the job/housing imbalance in the City and region, due to limited job opportunities. In addition, future job opportunities in the City will be less due to the COVID-19 closing of businesses.

The increased housing stock, reduced job opportunities, and increased jobs/housing imbalance that will result with the additional 3,726 residential units will prevent the City from complying with the sustainable communities' strategies that are described in SCAG's "2016-2040 Regional Transportation Plan/Sustainable Communities Strategy", which intends to balance future mobility and housing needs with economic, environmental, and public health goals. Since the additional 3,726 units will increase the City's housing stock but will not increase supportive employment opportunities, future population will be required to drive and commute to other areas outside City boundaries. Therefore, SCAG's objective for balancing future mobility and housing needs will not be achieved. Ironically, SCAG's requirement that the City provide 3,726 units will only create conflicts with other SCAG plans and programs relating to sustainability. The City believes that reducing the 3,726 units will help SCAG in balancing its mobility, housing, and employment needs.

**2. Insufficient Water and Sewer Capacity to Service the Excessive RHNA Unit Obligation**

Potable water is provided by the following water companies within the City: Bellflower Home Garden Water Company, Bellflower-Somerset Mutual Water Company, City of Bellflower Municipal Water System, and Liberty Utilities. The Los Angeles County Consolidated Sewer Maintenance District provides sewer service to the City.

To quantify how much these water and sewer utility agencies will be burdened with the additional 3,726 units, accepted and recognized generation factors were used to calculate future service demands. It was calculated that the 3,726 units will generate a water demand of 655,776 gallons per day, based on a factor of 176 gallons/day/unit (City of Los Angeles



CEQA Threshold Guide). In addition, sewer flows of 2,235,600 gallons per day, based on a factor of 600 gallons/day/unit (Chapter 13.12 of Bellflower Municipal Code and Resolution 08-36) will also ultimately be generated. Because water and sewer utility agencies are required to provide the necessary infrastructure and resources to accommodate future populations, the associated costs for providing infrastructure improvements could be challenging. The additional 3,726 units will increase City population by 11,960 or 16%. This population increase was calculated based on the City's average household size of 3.21 persons per household (2010 U.S. Census data).

Can this additional 3,726 units be equitably serviced by the Water Companies and County Sewer District? These agencies must also service the increased needs of neighboring cities that are located within these same service areas of the Water Companies and County Sewer District. The water demands and sewer flows are substantial and therefore, new and improved utility pipes, water supplies, wastewater treatment facilities, etc. would need to be provided to accommodate future water and sewer demands and to reduce burden on the Water Companies and County Sewer District. The City believes that reducing the 3,726 units will likewise, reduce service demands and burden on the Water Companies and County Sewer District.

**3. The Excessive RHNA Unit Obligation Will Prevent the City From Achieving Its Greenhouse Gas Emission Targets**

The City, in 2012, prepared the document entitled, "Bellflower Climate Action Plan (CAP)", which included a quantitative inventory and analysis of greenhouse gas emissions and energy usage, starting with the established 2010 baseline year to the years 2020 and 2030. The CAP was prepared to provide clear policy guidance to City staff and decision-makers on how to reduce greenhouse gas (GHG) emissions. It identified ways to reduce emissions with a range of voluntary, State-level emissions reduction goals and strategies for improving connectivity and land use patterns, transportation modes and systems, incorporating energy efficiency standards, increasing the City's renewable energy supply, and devising adaptation measures.

The CAP forecasted future GHG emissions for the City to the year 2030, based on population growth, increased per capita energy use, and a rebounding future economy. The CAP concluded that Bellflower's GHG emissions will increase from 339,985 MT CO<sub>2</sub>e of emissions in 2010 to 362,446 MT CO<sub>2</sub>e in 2020 (increase of 7 percent) to 386,674 MT CO<sub>2</sub>e in 2030 (increase of 14 percent).

In response to these GHG emission increases, the CAP recommended that Bellflower set a GHG emissions reduction target of 15 percent below 2005 levels by 2020, which would then result in reductions of 38 percent by 2030. The 2020 target was tied to the recommendation of the California Air Resources Board and the AB 32 Scoping Plan. The long-term 38 percent reduction goal was consistent with the target that was outlined in California Executive Order S-3-05, which required all cities to reduce GHG emissions to 80 percent below 1990 levels. To achieve the 15 percent reduction target from the 2010 baseline, the City would need to develop and implement strategies that reduce emissions by 73,459 MT CO<sub>2</sub>e in 2020. Given projected trends, this reduction would lower 2020 emissions to approximately 20 percent below 2020 "business-as-usual" levels (levels anticipated for 2020 in the absence of any local, State, or Federal interventions). To achieve a 38-percent 2030 emissions reduction goal, Bellflower would need to reduce emission by approximately 97,687 MT CO<sub>2</sub>e from business-as-usual levels.

The CAP recommended four strategies for reducing future GHG emissions, including strategies relating to building design, urban forms, government operations, and preparing for climate change. With implementation of these strategies, the CAP concluded that GHG emissions could be reduced to achieve the aforementioned targets. Through a combination of proposed Federal, State, and City-level actions, Bellflower could reduce emissions by 78,983 MT CO<sub>2</sub>e from the 2020 business-as-usual scenario. Future State-level actions, such as the Pavley Clean Cars legislation, the Low Carbon Fuel Standard, the Renewables Portfolio Standard, and Title 24 upgrades were also expected to further reduce emissions by 70,416 MT CO<sub>2</sub>e by 2020. Local measures could also reduce emissions by 8,494 MT CO<sub>2</sub>e. This combination of State and City actions would place Bellflower 17 percent below the 2010 emission levels by 2020; thus, exceeding the 2020 greenhouse gas emissions reduction target of 15 percent.

By 2030, the combination of State and local GHG emissions measures could then reduce emissions by 122,295 MT CO<sub>2</sub>e. State measures were expected to account for 92,563 MT CO<sub>2</sub>e with local actions resulting in a larger porportion of emissions reductions. These actions would then put Bellflower 19 percent below the business-as-usual forecast, between the State's voluntary 15 percent reduction target by 2020 and the more ambitious 80 percent goal by 2050.

The City is concerned that the additional 3,726 new units would prevent the City from achieving its GHG emission targets. To quantify the impact of these new units, the following formula from the document entitled, "CEQA and Climate Change", which was prepared by the California Air Pollution Control Officers Association in 2008, was used. According to the Association, every 50 new residential units would generate 900 MT CO<sub>2</sub>E/year, or every new residential unit would generate 18 MT CO<sub>2</sub>E/year. Based on this formula, the additional 3,726 new units would generate 67,068 MT CO<sub>2</sub>E/year. The Association's "CEQA and Climate Change" document concluded that the threshold for determining significant impact was 25,000 MT CO<sub>2</sub>E/year. Therefore, the 3,726 new units will generate significant GHG emission levels and will prevent the City from achieving those GHG emission targets established by the City's Climate Action Plan. The resultant increase in GHG emissions will facilitate climate changes that will not only impact the natural environment, but will also threaten the health and economic vitality of communities across California and Bellflower. It is anticipated that the increased GHG emissions will: (1) increase harmful air pollutants, such as carbon monoxide, sulfur dioxide, and particulate matter; (2) increase energy demand and utility costs for individuals, households, and businesses; and (3) reduce reinvestment in local buildings and infrastructure due to higher costs for improvements to save energy.

The City of Bellflower believes that the additional 3,726 new residential units being assigned by SCAG is excessive and will have long-term negative impacts to the City's economic vitality and overall health; will intensify the City's and region's jobs/housing imbalance; will burden those utility agencies' ability to provide sufficient water and sewer services to the City; and will prevent the City from achieving those GHG emission targets established by the City's Climate Action Plan. Accordingly, the City urges SCAG to consider reducing Bellflower's RHNA allocated units from 3,726 to 1,000 units.

The City appreciates the opportunity to provide this appeal letter and is available to further discuss any of the foregoing arguments and information. If you have any questions or require anything else, please contact me at (562) 804-1424, ext. 2276 or email at [ecorpuz@bellflower.org](mailto:ecorpuz@bellflower.org).

Sincerely,



Elizabeth Corpuz  
Director of Planning and Building Services

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Ave  
Sacramento, CA 95833-1829  
916) 263-2911 FAX: (916) 263-7453  
www.hcd.ca.gov



December 10, 2020

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

Dear Executive Director Ajise:

**RE: Comment on Appeals of the Draft Regional Housing Need Allocation (RHNA) Plan**

Thank you for the opportunity to comment on the 52 appeals Southern California Association of Governments (SCAG) has received regarding the draft RHNA plan. The appeal process is an important phase in the development of a RHNA plan that ensures that all relevant factors and circumstances are considered.

The only circumstances under which a jurisdiction can appeal are:

- 65584.05(b)(1): The council of governments failed to adequately consider the information regarding the factors listed in subdivision (e) of section 65584.04.
- 65584.05(b)(2): The council of governments failed to determine the share of the regional housing need in a manner that furthers the intent of the objectives listed in subdivision (d) of section 65584.
- 65584.05(b)(3): A significant unforeseen change in circumstances occurred in the local jurisdiction that merits a revision of the information submitted pursuant to subdivision (e) of Section 65584.04.

The California Department of Housing and Community Development (HCD) urges SCAG to only consider appeals that meet these criteria.

Per Government Code section 65584.05(e)(1), SCAG's final determination on whether to accept, reject, or modify any appeal must be accompanied by written findings, including how the final determination is based upon the adopted RHNA allocation methodology, and how any revisions are necessary to further the statutory objectives of RHNA described in Government Code section 65584(d).

Among the appeals based on Government Code section 65584.05(b)(1), several appeals state that SCAG failed to consider the factor described in Government Code section 65584.04(e)(2)(B), citing the lack of land suitable for development as a basis for the appeal. However, this section states the council of governments may not limit its consideration of suitable housing sites to existing zoning and land use restrictions and must consider the potential for increased development under alternative zoning and

land use restrictions. Any comparable data or documentation supporting this appeal should contain an analysis of not only land suitable for urban development, but land for conversion to residential use, the availability of underutilized land, and opportunity for infill development and increased residential densities. In simple terms, this means housing planning cannot be limited to vacant land, and even communities that view themselves as built out must plan for housing through means such as rezoning commercial areas as mixed-use areas and upzoning non-vacant land.

With regard to appeals submitted related to Government Code section 65584.05(b)(2), that SCAG failed to determine the RHNA in a manner that furthers the statutory objectives, it should be noted that HCD reviewed SCAG's draft allocation methodology and found that the draft RHNA allocation methodology furthered the statutory objectives described in Government Code section 65584.

Among the appeals based on Government Code section 65584.05(b)(2), several contend that the cap on units allocated to extremely disadvantaged communities (DACs) does not further RHNA's statutory objectives. This cap furthers the statutory objective to affirmatively further fair housing by allocating more units to high opportunity areas and fewer units to low resource communities, and concentrated areas of poverty with high levels of segregation. Due to the inclusion of this factor, as well as the use of TCAC/HCD Opportunity Maps, SCAG's methodology allocates 14 of the top 15 highest shares of lower-income RHNA to jurisdictions with over 99.95 percent High and Highest Resource areas. With the exceptions of two jurisdictions, the 31 jurisdictions with the highest share of lower-income RHNA are all over 95 percent High and Highest Resource areas. Any weakening of these inputs to the methodology could risk not fulfilling the statutory objective to affirmatively further fair housing.

Several appeals argue that SCAG's RHNA allocation methodology does not adequately promote access to jobs and transit, as required in objectives two and three. HCD's review of SCAG's RHNA methodology found the allocation does further the environmental principles of objective two. SCAG's overall allocation includes significant weight related to the location of high-quality transit areas and the regional distribution of jobs that can be accessed within a 30-minute driving commutes. Regarding objective three, HCD's analysis as to whether jobs-housing fit was furthered by SCAG's draft methodology found that across all jurisdictions there is generally good alignment between low-wage jobs and lower-income RHNA, with all but 15 jurisdictions within a half percent plus or minus difference between their share of lower-income RHNA for the region and their percentage low-wage jobs for the region.

Several appeals are based upon the provision described in Government Code section 65584.05(b)(3), arguing that the COVID-19 pandemic represents a significant and unforeseen change in circumstances that will affect future population and job growth. Ensuring everyone has a home is critical to public health. Reducing and preventing overcrowding and homelessness are essential concerns for every community. The COVID-19 pandemic has only increased the importance that each community is planning for sufficient affordable housing.

Lastly, several appeals state that the Regional Housing Needs Determination (RHND) HCD provided to the SCAG region is too large. SCAG submitted an objection to the RHND at the appropriate time and through the appropriate process. HCD considered those objections and [determined the final RHND for 6<sup>th</sup> Housing Element Cycle for the SCAG region on October 15, 2019](#). There are no further appeal procedures available to alter the SCAG region's RHND for this cycle. Government Code section 65584.05(b) does not allow local governments to appeal the RHND during the 45-day period following receipt of the draft allocation.

HCD acknowledges that many local governments will need to plan for more housing than in the prior cycle to accommodate a RHND that more fully captures the housing need and as the statutory objectives of RHNA shift more housing planning near jobs, transit, and resources. The Southern California region's housing crisis requires each jurisdiction to plan for the housing needs of their community and the region. In recognition of this effort there are more resources available than ever before to support jurisdictions as they prepare to update their 6<sup>th</sup> cycle housing elements:

- SB 2 Planning Grants – \$123 million one-time allocation to cities and counties
- SB 2 Planning Grants Technical Assistance offered to all jurisdictions
- Regional and Local Early Action Planning Grants – \$238 million one-time allocation for local and regional governments
- SB 2 Permanent Local Housing Allocation – approximately \$175 million annually in ongoing funding for local governments to increase affordable housing stock

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Megan Kirkeby, Deputy Director, [megan.kirkeby@hcd.ca.gov](mailto:megan.kirkeby@hcd.ca.gov).



Megan Kirkeby  
Deputy Director



# City of Whittier

13230 Penn Street, Whittier, California 90602-1716  
(562) 567-9320 Fax (562) 567-2872 www.cityofwhittier.org

Electronically Transmitted to: [Housing@scag.ca.gov](mailto:Housing@scag.ca.gov)

December 10, 2020

RHNA Appeals Committee  
Southern California Association of Governments  
900 Wilshire Blvd, Suite 1700  
Los Angeles, CA 90017

**SUBJECT: City of Whittier's Comments on Appeals to the Sixth Cycle Regional Housing Needs Assessment (RHNA) Allocation**

Honorable Chair and Honorable Committee Members:

The City of Whittier ("City") appreciates the challenges that are inherent in allocating 1,341,827 housing units by the thousands (a 226% increase above the baseline 412,137 unit) to cities across Southern California, especially in built-out cities. However, the City is deeply concerned its housing allocation of 3,431 units from the State Department of Housing and Community Development ("HCD") and the Southern California Association of Government's ("SCAG") unit distribution methodology, along with recent housing legislation will fundamentally abridge the City's ability to develop effective land-use policies that are appropriate for managing the community's actual needs. The 878 units in the 5<sup>th</sup> cycle RHNA allocation has been increased by 290% to 3,431 units in the current 6<sup>th</sup> cycle. Particularly challenging in the 6<sup>th</sup> cycle, is the number of low and very low-income units (1,558) which combined with the moderate and above moderate unit totals forces unplanned and unnecessary residential densification of the community.

The affordable units are an unfunded mandate with very limited regional or State financial support for their development. Considering the affordable housing subsidies typically range from \$50,000 to \$250,000 per unit, the overall funding requirements could range from \$78,000,000 to \$390,000,000 which is clearly beyond the reach of the City of Whittier in that the City's general fund budget is just \$72,000,000 which already include \$2,000,000 annually to house the City's unsheltered residents in transitional housing. Additionally, the City only receives 7.5% of each property tax dollar to provide general services including police and library services.

The City is currently in the process of updating its Housing Element as well as the General Plan to incorporate the current RHNA allocation, so Whittier is acutely aware of the various housing needs as well as the potential obstacles, such as aging infrastructure and unplanned density, to creating the requisite housing within a city that

is essentially built out. The changes in the State's housing laws (SB 35, SB 166 and AB 1397) have created additional constraints for the agencies and may severely impact the City's ability to accomplish our regional and local housing goals.

Since development in Whittier began more than 130 years ago, the City is virtually built-out with little developable vacant land outside of its designated open space areas that are dedicated to accommodating existing and future residents. While the City has made significant efforts through its specific plans to densify existing corridors and districts, the majority of Whittier's remaining single-family residential neighborhoods cannot accommodate similar densification. Furthermore, the hills north of Whittier contain regional open space, sensitive habitat and wildlife areas that must be preserved in perpetuity. There are also significant infrastructure and water service constraints that impact Whittier's ability to produce significantly more housing. Although these facts may not be desirable, they must be pragmatically accounted for and mitigated by not further increasing Whittier's share of housing units contained in SCAG's 6<sup>th</sup> Cycle RHNA. The final RHNA allocation and methodology must be fair and equitable while reflecting the capacity for reasonable housing unit construction.

As with many other cities, the City is concerned about the current allocation, but an even greater concern is that additional units may be applied to the City if reallocated from cities that are successful in their appeals. To that end, the City believes the appeal process itself was unclear as to the potential ramifications to other cities and not fully understood.

Although we fully support the surrounding cities in their appeals, the potential for additional units being applied to the City would exacerbate the problems described herein and in Whittier's September 13, 2019 letter to SCAG.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Jeffery S. Adams  
Director of Community Development

File

**From:** Christopher Koontz <Christopher.Koontz@longbeach.gov>  
**Sent:** Thursday, December 3, 2020 11:14 AM  
**To:** Regional Housing  
**Subject:** RHNA Appeals

**Categories:** Response Required, Record

Good morning,

The purpose of this email is to provide the City of Long Beach’s position in regards to pending RHNA appeals before SCAG. The City of Long Beach seeks to meet its housing needs and obligations for the benefit of Long Beach residents and the region. Our allocation was extremely large and presents a planning and financing challenge for the City. Nonetheless we chose not to appeal our allocation because the allocation process was fair and transparent including taking the City of Long Beach’s input into consideration.

We oppose and will not accept any transfer of additional allocation due to the pending appeals. We note that within our area, the Gateway COG, appeals are pending from Bellflower, Cerritos, Downey, Huntington Park, La Mirada, Lakewood, Pico Rivera, and South Gate. Each of these appeals should be evaluated by SCAG on the merits, however Long Beach opposes any transfer of allocation to our City. It would be inappropriate to transfer a further burden to Long Beach when we have already accepted a large allocation and have done more than many cities in the region to accommodate housing growth under the current RHNA cycle, including fully meeting our market-rate RHNA allocation.

The City of Long Beach will continue to work with SCAG and our neighbor jurisdictions to address the housing needs of our residents.

We thank you for consideration and please do not hesitate to contact the City regarding our position.

Christopher Koontz, AICP  
*Deputy Director*

Development Services  
411 W. Ocean Blvd., 3rd Floor | Long Beach, CA 90802  
Office: 562.570.6288 | Fax: 562.570.6068



Attachment: Comments Received During the Comment Period (General) (Appeal of the Draft RHNA Allocation for the City of Bellflower)





Southern California Association of Governments  
Remote Participation Only  
January 8, 2021

**To:** Regional Housing Needs Assessment Subcommittee (RHNA)

**EXECUTIVE DIRECTOR'S  
APPROVAL**

**From:** Karen Calderon, Associate Regional Planner,  
(213) 236-1983, calderon@scag.ca.gov

**Subject:** Appeal of the Draft RHNA Allocation for the City of Downey

**RECOMMENDED ACTION:**

Deny the appeal filed by the City of Downey (City) requesting SCAG conduct an assessment to verify the City's projected population and job growth.

**STRATEGIC PLAN:**

This item supports the following Strategic Plan Goal 2: Advance Southern California's policy interests and planning priorities through regional, statewide, and national engagement and advocacy.

**SUMMARY OF APPEAL:**

The City of Downey requests SCAG conduct an assessment to verify the City's projected population and job growth and, it asserts three bases for the appeal:

1. Existing and projected jobs-housing balance
2. Availability of land suitable for urban development or for conversion to residential use
3. Distribution of household growth assumed for purposes of comparable Regional Transportation Plans

**RATIONALE FOR STAFF RECOMMENDATION:**

Staff have reviewed the appeal and recommend no change to the City of Downey's RHNA allocation.

Regarding Issue 1, SCAG has reviewed input data and found no inconsistency between city forecasts and SCAG's; however, the majority of the City's Draft RHNA Allocation is based on existing need measures rather than projected growth. Issue 2 was not demonstrated to be an impediment since housing legislation does not preclude consideration of all non-vacant sites or alternate zoning, which is required to be considered. Additionally, evidence from a utility service provider that would

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*To foster innovative regional solutions that improve the lives of Southern Californians through inclusive collaboration, visionary planning, regional advocacy, information sharing, and promoting best practices.*

**OUR VISION**

*Southern California's Catalyst for a Brighter Future*

**OUR CORE VALUES**

*Be Open | Lead by Example | Make an Impact | Be Courageous*

preclude the construction of new housing was not demonstrated. Regarding Issue 3, the City of Downey's RHNA allocation was assigned in a manner consistent with the development pattern in Connect SoCal.

## **BACKGROUND:**

### **Draft RHNA Allocation**

Following the adoption of the Final RHNA Methodology on March 5, 2020 and the adoption of Connect SoCal on September 3, 2020, all local jurisdictions received Draft RHNA Allocations on September 11, 2020. A summary is below.

|   |                    |
|---|--------------------|
| <b>Total RHNA for the City of Downey:</b> | <b>6,510 units</b> |
| Very Low Income:                          | 2,074 units        |
| Low Income:                               | 944 units          |
| Moderate Income:                          | 913 units          |
| Above Moderate Income:                    | 2,579 units        |

Additional background related to the Draft RHNA Allocation is included in Attachment 1.

### **Summary of Comments Received during 45-day Comment Period**

No comments were received from local jurisdictions or HCD during the 45-day public comment period described in Government Code section 65584.05(c) which specifically regard the appeal filed for the City of Downey. Three comments were received which relate to appeals filed generally:

- HCD submitted a comment on December 10, 2020 delineating the statutory basis for RHNA appeals and the requirement that any appeals granted must include written findings regarding how revisions are necessary to further RHNA's statutory objectives.
- The City of Whittier submitted a comment on December 10, 2020 supporting surrounding cities in their appeals but expressing concern that additional units may be applied to Whittier if reallocated from cities which are successful in their appeals.
- The City of Long Beach submitted a comment on December 3, 2020 indicating their view that the RHNA allocation process was fair and transparent, their support for evaluating appeals on their merits (specifically those from the Gateway Council of Governments), and their opposition to any action which would result in a transfer of additional units to Long Beach.

## **ANALYSIS:**

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***Issue 1: Existing or projected jobs-housing balance [Govt. Code § 65584.04(e)(1)].***

*The City of Downey claims that there were inconsistencies with the City's employment forecasting compared to SCAG's SED estimates and data map book. Specifically, the City provided a response identifying that the baseline population estimate was higher than Census estimates and the California Department of Finance (CA DOF) population estimates, and requests SCAG to conduct an assessment that is reflective of the City's accurate projection of population and job growth.*

**SCAG Staff Response:** Please see staff report Attachment 1, "Local Input and Development of Draft RHNA Allocation" which describes the extent of local engagement and review opportunities provided to local jurisdictions on the employment job forecast. Review opportunities began in October 2017. While the initial deadline for input was October 2018, additional review opportunities were provided to all local jurisdictions through June 2020.

In May 2018, SCAG staff met with local jurisdiction staff to discuss the Bottom-Up Local Input and Envisioning Process and answer questions about the RHNA and Connect SoCal process. Input from the City of Downey on the growth forecast was received in October 2018 and SCAG revised the preliminary population, household and employment data for the City of Downey based on that input. The final population, household and employment data were reviewed and verified by the City in October 2018 as shown in the City of Downey Data Input and Verification Form, attached to this staff report. SCAG received additional technical corrections from the City of Downey and incorporated them into the Growth Vision in late 2019. The City of Downey's TAZ-level data utilized in the Connect SoCal Growth Vision matches input provided during the Bottom-Up Local Input and Envisioning Process, since that data was reflective of the policies and strategies of the Plan. Therefore, SCAG has already reviewed and incorporated the City of Downey's input on its projected population, household and employment data and does not recommend a reduction to the jurisdiction's draft RHNA allocation based on this factor.

While the City attests that there are inconsistencies in forecast data, forecasted growth comprises only one part of SCAG's adopted 6<sup>th</sup> cycle RHNA methodology. In Downey's case, only 480 units of its draft allocation (7.4 percent) are due to projected need. The remainder are due to existing need measures, namely transit accessibility and job accessibility.

The adopted RHNA methodology includes a calculation of job accessibility as one of the factors to determine a jurisdiction's draft RHNA allocation. Job accessibility is defined as the jurisdiction's share of regional jobs accessible within a 30-minute drive commute (additional details are found in the adopted RHNA methodology). This is **not** a measure of the number of jobs within a jurisdiction; rather, it is a measure of how many jobs can be accessed by a jurisdiction's residents, which can include jobs outside of the jurisdiction. Over 80 percent of SCAG region workers live and work in

different jurisdictions, which calls for an approach to the region's job housing relationship through the measurement of access rather than number of jobs within a certain jurisdiction. Specifically, as indicated in Attachment 1 of this staff report, the share of future (2045) regional jobs which can be reached in a 30-minute automobile commute from the local jurisdiction's median TAZ is used as to allocate housing units based on transit accessibility. From the City of Downey's median TAZ, it will be possible to reach 20.94% of the region's jobs in 2045 within a 30-minute automobile commute (2,104,000 jobs, based on Connect SoCal's 2045 regional job forecast of 10,049,000 jobs), as shown in the Map of Job Accessibility in the City of Downey, attached to this staff report.

These existing need measures follow the policy direction of SCAG's Regional Council as expressed in the 6<sup>th</sup> cycle RHNA methodology. The RHNA methodology itself cannot be changed through the appeals process and as such staff cannot recommend a reduction on this basis.

***Issue 2: Availability of land suitable for urban development [Govt. Code § 65584.04(e)(2)(B)].***

*The City of Downey claims that they are a built-out urban area with limited land availability and existing infrastructure is aged more than 50 years so any improvements to existing water and sewer systems needed will serve as a deterrent to housing developers who are not able to bear the cost of infrastructure improvements in addition to land and construction costs. The City of Downey also claims that recent legislation like SB 166 and AB 1397 will hinder housing developers from wanting to develop housing in their city due to requirements of maximizing underdeveloped or underutilized sites.*

**SCAG Staff Response:** Pursuant to Government Code Section 65584.04(e)(2)(B), SCAG “may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality” (which includes the land use policies in its General Plan). “Available land suitable for urban development or conversion to residential use,” as expressed in 65584.04(e)(2)(B), is not restricted to vacant sites; rather, it specifically indicates that underutilized land, opportunities for infill development, and increased residential densities are a component of ‘available’ land. As indicated by HCD in its December 10, 2020 comment letter (HCD Letter):

“In simple terms, this means housing planning cannot be limited to vacant land, and even communities that view themselves as built out must plan for housing through means such as rezoning commercial areas as mixed-use areas and upzoning non-vacant land.” (HCD Letter at p. 2).

As such, the City can consider other opportunities for development. This includes the availability of underutilized land, opportunities for infill development and increased residential densities, or alternative zoning and density. Alternative development opportunities should be explored further

and could possibly provide the land needed to zone for the City's projected growth. Furthermore, on June 10, 2020, HCD released extensive guidelines for housing element site inventories which considers AB 1397's changes<sup>1</sup>. A wide range of adequate sites are detailed including accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs). Specifically, the guidelines indicate that (page 32):

"In consultation with HCD, other alternatives may be considered such as motel conversions, adaptive reuse of existing buildings, or legalization of units not previously reported to the Department of Finance."

Note that while zoning and capacity analysis is used to meet RHNA need, they should not be used to allocate RHNA need. Per the adopted RHNA methodology, RHNA need at the jurisdictional level is determined by projected household growth, transit access, and job access. Housing need, both existing and projected need, is independent of zoning and other related land use restrictions, and in some cases is exacerbated by these very same restrictions. Thus, land use capacity that is restricted by factors unrelated to existing or projected housing need cannot determine existing or projected housing need.

In addition, costs to upgrade and develop appropriate infrastructure and comply with recent legislation cannot be considered by SCAG as a justification for a reduction since the RHNA Allocation is not a building quota. Rather, a jurisdiction is required to plan and zone for housing need and is not required to develop the assigned units.

***Issue 3: Distribution of household growth assumed for purposes of comparable Regional Transportation Plans [Govt. Code § 65584.04(e)(3)].***

*The City of Downey claims its RHNA allocation is not consistent with its current growth projections. The prior growth projections overestimated the City's growth forecasts by 8.6% to 13.4 % in different categories.*

**SCAG Staff Response:** Each jurisdiction, including the City of Downey's RHNA allocation has two components: the projected need and existing need. The projected need component is primarily based on household growth in Connect SoCal, SCAG's 2020-2045 Regional Transportation Plan which was fully adopted in September 2020. As described in Attachment 1, the City's projected need consists of 480 units. Specifically, household growth for the city during the RHNA projection period is for 402 units. In addition, there are two adjustment factors of vacancy need (13 units) and replacement need (65 units). The projected need for the city is the sum of household growth, vacancy need and replacement need. As described under Issue 1, the City reviewed and verified the

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<sup>1</sup> See [https://www.hcd.ca.gov/community-development/housing-element/docs/sites\\_inventory\\_memo\\_final06102020.pdf](https://www.hcd.ca.gov/community-development/housing-element/docs/sites_inventory_memo_final06102020.pdf)

forecasted population, household and employment data (see Data Input and Verification Form, attached).

Legislative changes in 2018 modified the nature of the regional housing need determination for the 6<sup>th</sup> cycle of RHNA by adding measures of household overcrowding and housing cost burden to the list of factors to be considered by HCD for the determination of housing need. As determined by HCD, a large share of the region's housing need is based on factors other than future household growth and can be characterized as existing need. The existing need of the City (6,029 units) is its share of the regional existing need based on HQTAs population share (1,678 units) and job accessibility (3,830 units), considering opportunities to maximize the use of public transportation and existing transportation infrastructure. These new measures are not included in the Connect SoCal Growth Forecast because they are not direct inputs to the growth forecasting process and are independent of employment and population projections. In contrast, they reflect additional latent housing needs in the current population (i.e., "existing need") and would not result in a change in regional population. SCAG's RHNA methodology explicitly ensures that these units are allocated to jurisdictions across the region based on measures of transit and job accessibility such that future housing development can maximize the use of public transportation and existing infrastructure.

Ultimately, the Regional Transportation Plan/Sustainable Communities Strategy is a related, but separate process from the Regional Housing Needs Assessment. The RHNA identifies anticipated housing need over a specified eight-year period and requires that local jurisdictions make available sufficient zoned capacity to accommodate this need. In contrast, the Connect SoCal Growth Forecast is an assessment of the reasonably foreseeable future pattern of growth given, among other factors described above, the availability of zoned capacity. For further discussion see Attachment 1 as well as Connect SoCal Master Response 1 at [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial\\_public-participation-appendix-2.pdf](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_public-participation-appendix-2.pdf)

In summary, the City of Downey's RHNA allocation is consistent with the distribution of household growth envisioned in Connect SoCal and maximizes the use of public transportation and existing transportation infrastructure. For this reason, SCAG staff does not recommend a reduction to its draft RHNA allocation based on this factor.

**FISCAL IMPACT:**

Work associated with this item is included in the current FY20-21 Overall Work Program (300-4872Y0.02: Regional Housing Needs Assessment).

**ATTACHMENT(S):**

1. Local Input and Development of Draft RHNA Allocation (City of Downey)
2. Appeal Form and Supporting Documentation (City of Downey)



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3. SCAG's Objection to HCD's Regional Housing Need Determination
  4. Embarcadero Institute Report
  5. Freddie Mac Economic and Housing Research Insight
  6. Data Input and Verification Form (City of Downey)
  7. Map of Job Accessibility in the City of Downey
  8. Comments Received During the Comment Period (General)

## **Attachment 1: Local Input and Development of Draft RHNA Allocation**

This attachment sets forth the nature and timing of the opportunities which the City of Downey had to provide information and local input on SCAG's growth forecast, the RHNA methodology, and the Growth Vision of the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). It also describes how the RHNA Methodology development process integrates this information in order to develop the City of Downey's Draft RHNA Allocation.

### **1. Local Input**

#### ***a. Bottom-Up Local Input and Envisioning Process***

On October 31, 2017, SCAG took the first step toward developing draft RHNA allocations by initiating the Bottom-Up Local Input and Envisioning Process. At the direction of the Regional Council, the objective of this process was to seek local input and data to prepare for Connect SoCal and the 6<sup>th</sup> cycle of RHNA.<sup>1</sup> Each jurisdiction was provided with a package of land use, transportation, environmental, and growth forecast data for review and revision which was due on October 1, 2018.<sup>2</sup> While the local input process materials focus principally on jurisdiction-level and Transportation Analysis Zone (TAZ) level growth, input on specific parcels, sites, and project areas were welcomed and integrated into SCAG's growth forecast as well as data on other elements. SCAG met one-on-one with all 197 local jurisdictions between November 2017 and July 2018 and provided training opportunities and staff support. Following input from SCAG's Technical Working Group (TWG), the Connect SoCal growth forecast reflected precisely the jurisdiction-level growth totals provided during this process.

The local input data included SCAG's preliminary growth forecast information. For the City of Downey, the anticipated number of households in 2020 was 34,424 and in 2030 was 35,437 (growth of 1,013 households). In May 2018, SCAG staff met with local jurisdiction staff to discuss the Bottom-Up Local Input and Envisioning Process and answer questions. Input from the City of Downey on the growth forecast was received in October 2018. Following input, household totals were 32,840 in 2020 and 33,327 in 2030 (growth of 487 households), for a reduced household growth during this period of 567 compared to the preliminary growth forecast data.

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<sup>1</sup> While the RTP/SCS and RHNA share data elements, they are distinct processes. The RTP/SCS growth forecast provides an assessment of reasonably foreseeable future patterns of employment, population, and household growth in the region given demographic and economic trends, and existing local and regional policy priorities. The RHNA identifies anticipated housing need over a specified eight-year period and requires that local jurisdictions make available sufficient zoned capacity to accommodate this need. A further discussion of the relationship between these processes can be found in Connect SoCal Master Response 1 at [https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal\\_Public-Participation-Appendix-2.pdf](https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal_Public-Participation-Appendix-2.pdf).

<sup>2</sup> A detailed list of data during this process reviewed can be found in each jurisdiction's Draft Data/Map Book at <http://scagrtpscs.net/Pages/DataMapBooks.aspx>



### **b. RHNA Methodology Surveys**

On March 19, 2019, SCAG distributed a packet of methodology surveys, which included the local planning factor survey (formerly known as the AB2158 factor survey), Affirmatively Furthering Fair Housing (AFFH) survey, and replacement need survey, to SCAG jurisdictions' Community Development Directors. Surveys were due on April 30, 2019. SCAG reviewed all submitted responses as part of the development of the Draft RHNA Methodology. The City of Downey submitted the following surveys prior to the adoption of the Draft RHNA Methodology:

- Local planning factor survey
- Affirmatively Furthering Fair Housing (AFFH) survey
- Replacement need survey
- No survey was submitted to SCAG

### **c. Connect SoCal Growth Vision and Additional Refinements**

Beginning in May 2018, SCAG's Sustainable Communities Working Group began the process of developing growth scenarios for the SCAG region. The culmination of this work was the development of the Connect SoCal Growth Vision, which directly uses jurisdictional-level growth projections from the Bottom-Up Local Input and Envisioning process, and also features strategies for growth at the TAZ-level that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Additional detail regarding the Connect SoCal Growth Vision, specifically the Transportation Analysis Zone (TAZ, or neighborhood) level projections is found at <https://www.connectsocial.org/Documents/DataMapBooks/Growth-Vision-Methodology.pdf>.

As a result of these strategies, in some jurisdictions growth at the TAZ-level differed from locally anticipated growth conveyed during the Bottom-Up Local Input and Envisioning Process.

As such, SCAG provided two additional opportunities for all local jurisdictions to make TAZ-level technical refinements on the topics of general plan capacities and entitlements. During the release of the draft Connect SoCal Plan, jurisdictions were notified on October 31, 2019 that SCAG would accept additional refinements until December 11, 2019. Following the Regional Council's decision to delay full adoption of Connect SoCal for 120 days due to the COVID-19 pandemic, all jurisdictions were again notified on May 26, 2020 that SCAG would accept additional refinements until June 9, 2020.

Connect SoCal Growth Vision data have been available to local jurisdiction staff during the entirety of this process through SCAG's Scenario Planning Model Data Management Site (SPM-DM) at <http://spmdm.scag.ca.gov> and updates were shared with local jurisdictions on technical refinements to the data in February 2020 and August 2020 to share the results of both review opportunities.

SCAG received additional technical corrections from the City of Downey and incorporated them into the Growth Vision in late 2019. The City of Downey's TAZ-level data utilized in the Connect SoCal Growth Vision matches input provided during the Bottom-Up Local Input and Envisioning Process.

## 2. Development of the Final RHNA Methodology

SCAG convened the first meeting of the RHNA Subcommittee in October 2018. In their subsequent monthly meetings, this body reviewed and advised on the development of SCAG's 6<sup>th</sup> cycle RHNA process, including the development of the RHNA methodology. Per Government Code 65584.04(a), SCAG must develop a RHNA methodology which furthers the five statutory objectives of RHNA:

*(1) Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households.*

*(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.*

*(3) Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.*

*(4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.*

*(5) Affirmatively furthering fair housing (Govt. Code § 65584(d)).*

As explained in more detail below, the Draft RHNA Methodology (which was adopted as the Final RHNA Methodology) set forth the policy factors, data sources, and calculations which would be used to generate draft RHNA allocations for all local jurisdictions. Following extensive debate and public comment, SCAG's Regional Council voted to approve the Draft RHNA Methodology on November 7, 2019 and provide it to HCD for review. Per Government Code 65584.04(i), HCD is vested with the authority to determine whether a methodology furthers the objectives set forth in Government Code section 65584(d). On January 13, 2020, HCD found that the Draft RHNA Methodology furthers these five statutory objectives of RHNA. Specifically, HCD noted that:

*“This methodology generally distributes more RHNA, particularly lower income RHNA, near jobs, transit, and resources linked to long term improvements of life outcomes. In particular, HCD applauds the use of the objective factors specifically linked the statutory objectives in the existing need methodology.” (Letter from HCD to SCAG dated January 13, 2020 at <https://scag.ca.gov/sites/main/files/file-attachments/hcd-review-rc-approved-draft-rhna-methodology.pdf?1602190239>).*

On March 5, 2020, again following extensive debate and public comment, the Regional Council voted to approve the Draft RHNA Methodology as the Final RHNA Methodology. Unlike SCAG’s 5<sup>th</sup> cycle RHNA methodology which relies almost entirely on the household growth component of the RTP/SCS, SCAG’s 6<sup>th</sup> cycle RHNA methodology consists of two primary elements: “projected need” which includes the number of housing units required to accommodate anticipated population growth over the 8-year RHNA planning period and “existing need,” which refers to the number of housing units required to accommodate excess or unsatisfied housing demand experienced by the region’s current population.<sup>3</sup> Furthermore, the Final RHNA methodology utilizes measures of 2045 job accessibility and High Quality Transit Area (HQTa) population measures based on TAZ-level projections in the Connect SoCal Growth Vision.

More specifically, the Final RHNA Methodology considers three primary factors in determining a local jurisdiction’s total housing need which are primarily based on data from Connect SoCal’s aforementioned Bottom-Up Local Input and Envisioning Process:

- Forecasted growth over 2020-2030 (projected need)
- Transit accessibility in 2045 (existing need)
- Job accessibility in 2045 (existing need)

The methodology is described in further detail at:

<http://scag.ca.gov/programs/Documents/RHNA/SCAG-Final-RHNA-Methodology-030520.pdf>.

### 3. Draft RHNA Allocation for the City of Downey

Following the adoption of the Final RHNA Methodology on March 5, 2020 and the 120 day delay due to the COVID-19 pandemic, SCAG adopted Connect SoCal on September 3, 2020, and the City of Downey received its draft RHNA allocation on September 11, 2020. Application of the RHNA

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<sup>3</sup> Legislative changes in 2018 modified the nature of the regional housing need determination for the 6<sup>th</sup> cycle of RHNA by adding measures of household overcrowding and housing cost burden to the list of factors to be considered by HCD for the determination of housing need. These new measures are not included in the Connect SoCal Growth Forecast because they are not direct inputs to the growth forecasting process and are independent of employment and population projections. In contrast, they reflect additional latent housing needs in the current population (i.e. “existing need”) and would not result in a change in regional population. For further discussion see Connect SoCal Master Response 1 at [https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal\\_Public-Participation-Appendix-2.pdf](https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal_Public-Participation-Appendix-2.pdf).

methodology yields the draft RHNA allocation for the City of Downey as summarized in the data and calculations in the tables below.

| Downey city statistics and inputs:   |           | Calculation of Draft RHNA Allocation for Downey city  |             |
|--|-----------|---|-------------|
| Forecasted household (HH) growth, RHNA period:<br><i>(2020-2030 Household Growth * 0.825)</i>  | 402       | Forecasted household (HH) growth, RHNA period:  | 402         |
| Percent of households who are renting:   | 49%       | Vacancy Adjustment<br><i>(5% for renter households and 1.5% for owner households)</i>   | 13          |
| Housing unit loss from demolition (2009-18):   | 65        | Replacement Need  | 65          |
| Adjusted forecasted household growth, 2020-2045:<br><i>(Local input growth forecast total adjusted by the difference between the RHNA determination and SCAG's regional 2020-2045 forecast, +4%)</i> | 1,279     | <b>TOTAL PROJECTED NEED:</b>  | <b>480</b>  |
| Percent of regional jobs accessible in 30 mins (2045):<br><i>(For the jurisdiction's median TAZ)</i>   | 20.94%    | Existing need due to job accessibility (50%)  | 3830        |
| Jobs accessible from the jurisdiction's median TAZ (2045):<br><i>(Based on Connect SoCal's 2045 regional forecast of 10,049M jobs)</i>   | 2,104,000 | Existing need due to HQTAs pop. share (50%)   | 1678        |
| Share of region's job accessibility (population weighted):   | 0.92%     | Net residual factor for existing need<br><i>(Negative values reflect a cap on lower-resourced community with good job and/or transit access. Positive values represent this amount being redistributed to higher-resourced communities based on their job and/or transit access.)</i> | 520         |
| Jurisdiction's HQTAs population (2045):  | 41,029    | <b>TOTAL EXISTING NEED</b>  | <b>6029</b> |
| Share of region's HQTAs population (2045):   | 0.40%     | <b>TOTAL RHNA FOR DOWNEY CITY</b>   | <b>6510</b> |
| Share of population in low/very low-resource tracts:   | 0.02%     | Very-low income (<50% of AMI)   | 2074        |
| Share of population in very high-resource tracts:  | 0.00%     | Low income (50-80% of AMI)  | 944         |
| Social equity adjustment:  | 150%      | Moderate income (80-120% of AMI)  | 913         |
|  |           | Above moderate income (>120% of AMI)  | 2579        |

The transit accessibility measure is based on the population anticipated to live in High-Quality Transit Areas (HQTAs) in 2045 based on Connect SoCal's designation of high-quality transit areas and population forecasts. With a forecasted 2045 population of 41,029 living within HQTAs, the City of Downey represents 0.40% of the SCAG region's HQTAs population, which is the basis for allocating housing units based on transit accessibility.

Job accessibility is defined as the jurisdiction's share of regional jobs accessible within a 30-minute drive commute. Since over 80 percent of the region's workers live and work in different jurisdictions, the RHNA methodology uses a measure based on Connect SoCal's travel demand model output for the year 2045 rather than assigning housing units based on the number of jobs with a specific jurisdiction. Specifically, the share of future (2045) regional jobs which can be reached in a 30-minute automobile commute from the local jurisdiction's median TAZ is used as to allocate housing units based on transit accessibility. From the City of Downey's median TAZ, it will be possible to reach 20.94% of the region's jobs in 2045 within a 30-minute automobile commute (2,104,000 jobs, based on Connect SoCal's 2045 regional job forecast of 10,049,000 jobs).

An additional factor is included in the methodology to account for RHNA Objective #5 to Affirmatively Further Fair Housing (AFFH). Several jurisdictions in the region which are considered disadvantaged communities (DACs) on the basis of access to opportunity measures (described further in the RHNA methodology document), but which also score highly in job and transit access, may have their total RHNA allocations capped based on their long-range (2045) household forecast. This additional housing need, referred to as residual, is then reallocated to non-DAC jurisdictions in order to ensure housing units are placed in higher-resourced communities consistent with AFFH principles. This reallocation is based on the job and transit access measures described above, and results in an additional 520 units assigned to the City of Downey.

Please note that the above represents only a partial description of key data and calculations in the RHNA methodology.

**Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form**  
*All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.*  
*Appeals and supporting documentation should be submitted to [housing@scaq.ca.gov](mailto:housing@scaq.ca.gov).*  
*Late submissions will not be accepted.*

Date: \_\_\_\_\_ Jurisdiction Subject to This Appeal Filing: \_\_\_\_\_  
*(to file another appeal, please use another form)*

Filing Party (Jurisdiction or HCD)  
\_\_\_\_\_

Filing Party Contact Name  
\_\_\_\_\_

Filing Party Email:  
\_\_\_\_\_

**APPEAL AUTHORIZED BY:**

Name: \_\_\_\_\_

**PLEASE SELECT BELOW:**

- Mayor
- Chief Administrative Office
- City Manager
- Chair of County Board of Supervisors
- Planning Director
- Other: \_\_\_\_\_

**BASES FOR APPEAL**

- Application of the adopted Final RHNA Methodology for the 6<sup>th</sup> Cycle RHNA (2021-2029)
- Local Planning Factors and/or Information Related to Affirmatively Furthering Fair Housing (See Government Code Section 65584.04 (b)(2) and (e))
  - Existing or projected jobs-housing balance
  - Sewer or water infrastructure constraints for additional development
  - Availability of land suitable for urban development or for conversion to residential use
  - Lands protected from urban development under existing federal or state programs
  - County policies to preserve prime agricultural land
  - Distribution of household growth assumed for purposes of comparable Regional Transportation Plans
  - County-city agreements to direct growth toward incorporated areas of County
  - Loss of units contained in assisted housing developments
  - High housing cost burdens
  - The rate of overcrowding
  - Housing needs of farmworkers
  - Housing needs generated by the presence of a university campus within a jurisdiction
  - Loss of units during a state of emergency
  - The region's greenhouse gas emissions targets
  - Affirmatively furthering fair housing
- Changed Circumstances (Per Government Code Section 65584.05(b), appeals based on change of circumstance can only be made by the jurisdiction or jurisdictions where the change in circumstance occurred)

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_ Hearing Date: \_\_\_\_\_ Planner: \_\_\_\_\_

**Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form**  
*All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.*  
*Appeals and supporting documentation should be submitted to [housing@scaq.ca.gov](mailto:housing@scaq.ca.gov).*  
*Late submissions will not be accepted.*

**Brief statement on why this revision is necessary to further the intent of the objectives listed in Government Code Section 65584 (please refer to Exhibit C of the Appeals Guidelines):**

**Please include supporting documentation for evidence as needed, and attach additional pages if you need more room.**

**Brief Description of Appeal Request and Desired Outcome:**

**Number of units requested to be reduced or added to the jurisdiction's draft RHNA allocation (circle one):**

Reduced \_\_\_\_\_ Added \_\_\_\_\_

**List of Supporting Documentation, by Title and Number of Pages**

**(Numbers may be continued to accommodate additional supporting documentation):**

- 1.
- 2.
- 3.
4. Exhibit D - Freddie Mac Economic and Housing Research Insight: February 2020 (11 Pages)

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_ Hearing Date: \_\_\_\_\_ Planner: \_\_\_\_\_



**CITY COUNCIL**

MAYOR  
BLANCA PACHECO

MAYOR PRO TEM  
CLAUDIA M. FROMETA

COUNCIL MEMBERS  
SEAN ASHTON  
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ALEX SAAB

CITY MANAGER  
GILBERT A. LIVAS

CITY CLERK  
ALICIA DUARTE, CMC

CITY ATTORNEY  
YVETTE M. ABICH GARCIA

October 20, 2020

RHNA Appeals Committee  
Southern California Association of Governments  
900 Wilshire Blvd, Suite 1700  
Los Angeles, CA 90017

**SUBJECT: City of Downey Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal**

Honorable Chair and Honorable Committee Members:

The City of Downey is committed to promoting the development of a mix of quality housing developments throughout the City to increase its available housing supply. The Housing Element update process provides each community the opportunity to thoughtfully examine its current policies and evaluate the best comprehensive approach to address the growth that they will experience. This is a valuable process that the City enters into with high regard for the intended objectives but desires to produce a plan that will set forth attainable goals and outcomes. The exponential increase in the 6<sup>th</sup> RHNA cycle allocation compared to the 5<sup>th</sup> RHNA cycle allocation has caused significant concern to the potential for development of an achievable housing plan. As such, the City is submitting this request for an appeal of its 6<sup>th</sup> RHNA cycle appeal.

**Brief statement on why this revision is necessary to further the intent of the objectives listed in Government Code Section 65584 (please refer to Exhibit C of the Appeals Guidelines):**

SCAG has indicated that past Housing Element update cycles have fallen behind in addressing the rate of growth in the area resulting in larger RHNA allocations for all jurisdictions during this RHNA cycle. The need to reduce the discrepancy is understood and valued; however, a community such as Downey, despite its commitment to meeting its share of this need, faces several constraints to meeting its exponentially larger 6<sup>th</sup> cycle RHNA allocation.

The City of Downey is a built-out urban area with limited land availability and an existing infrastructure that is aged more than 50 years. Improvements and upgrades to existing systems will be required throughout implementation of the eight year housing cycle because additional units will result in additional demand on the existing water and sewer systems. The cost of such improvements serve as a deterrent to housing developers who are not able to bear the cost of infrastructure improvements in addition to land and construction costs.



The intent of SB 166 is to ensure that properties identified for housing development are utilized to their full capacity throughout the housing cycle. The inadvertent concern is that this may slow the development of housing units in the effort to maximize the full capacity of property available for potential development. Despite seeming counterintuitive, not all developers are interested in maximizing the number of units on a property. This can result from various factors such as meeting parking requirements to incurring infrastructure improvement costs, resulting in the City being required to deny a potential project if there are no other viable properties compliant with AB 1397 to supplement the remaining potential number of housing units from an underdeveloped site.

These constraints are faced by many of cities struggling to address larger RHNA allocations than they have previously been assigned. The City of Downey is ready to plan for its share of the region's need but, seeks assistance to ensure that it plans for a fair share of that need. Paragraph (3) of subdivision (a) 655584 of Section 65584 of the Government Code declares that insufficient housing in job centers hinders the state's environmental quality and runs counter to the state's environmental goals. As such, paragraph (3) of subdivision (d) of Section 65584 states one of the objectives of regional housing needs allocation plans is to ensure that all regions promote an intraregional relationship between jobs and housing. Achievement of this goal requires an appropriate distribution of housing need projection that are representative of the existing and future conditions of the region and the jurisdictions they encompass. The revision requested by the City of Downey is to seek the achievement of this objective by conducting an assessment that is reflective of the City's projected population and job growth.

The City of Downey provided Local Input on the SCAG SED Estimates/Projections and Data/Map Book which identified several discrepancies with the maps and GIS data as well as an overestimation of growth forecasts in the City with the greatest being employment forecasting. The City of Downey provided a response identifying that the baseline population estimate was higher than Census estimates and the California Department of Finance population estimates. The overestimated baseline multiplied the growth forecast and projections for the City of Downey. The use of overestimated data input into the RHNA methodology for allocation could have resulted in a larger allocation than appropriate for the City. Due to the importance of achieving proper distribution of housing near employment centers, it would be prudent to review and ensure representative data was used.

**Brief Description of Appeal Request and Desired Outcome:**

The City of Downey is requesting consideration of a revision to its 6<sup>th</sup> RHNA cycle allocation in an effort to ensure that the City is in a position to reasonably attain the objectives of Government Code Section 65584. The City aims to promote an increase in its housing supply and diversification in the type of housing availability throughout the City; however, the limitations of a built-out urban community restrict some of the potential to achieve these goals.

In the prior RHNA cycle, the City promoted infill development and worked with developers to permit 561 residential units throughout the last eight year cycle. This development was a result of the City's focus on infill development which included the rezoning of some commercial and manufacturing zoned properties to designate them as residential to allow for high density residential development.

This request for a new assessment of its 6<sup>th</sup> RHNA cycle allocation is a result of the City's sincere and earnest approach at developing a successful Housing Element update. The City is aware of the existing constraints that exist for this metropolitan community and the various factors that contribute to successful housing developments. The City is seeking a reassessment of the data used in determining allocation to ensure that this allocation is appropriately attributed.

In an effort to ensure that the regional need is properly distributed, an assessment to verify that the data used in the allocation was accurate and representative of Downey's existing community and projected growth is reasonable. The City requests the data sources used to input the City's growth estimations accurately represent the City's current conditions and projected growth. In prior estimations provided by SCAG, the data sets overestimated the City's growth forecasts by 8.6% to 13.4% in different categories. Such percentage differences can result in a skewed result that would have significant impacts on the City's 6<sup>th</sup> RHNA cycle.

The City of Downey's existing constraints and the adoption of several new housing bills (SB35, SB166, AB1397) foster a challenge to the successful implementation of the Housing Element update. The City is committed to promoting the development of a mix of quality housing units throughout the community to satisfy its share of the need for residential growth in the region but, it does want to ensure that it is planning for its fair share of the need.

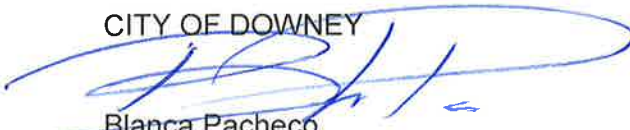
In SCAG's September 18, 2019 letter to HCD, significant concern was expressed over the use of a projection that was 1.32% over SCAG's population forecast. As further discussed in the letter, the proper use of current, accurate, and representative data is very impactful when assessing housing needs for the region. Similarly, the City of Downey is concerned that accurate and representative data was used in the determination of its allocation. An overestimation in its growth potential would result in additional burden added to the existing constraints that the City contends with in attempting to achieve a viable Housing Element update.

This request is made with understanding of the difficult position that HCD has created for SCAG by not accepting the September 18, 2019 letter and its valid interpretation of Government Code 65584.01(a) and 65584.01(c)(2)(B). The City of Downey is requesting similar consideration to ensure that appropriate data is utilized in determining its allocation to allow the City to develop an attainable plan that promotes quality housing development throughout the City. One goal of Government Code Section 65584 is to promote infill and socioeconomic equity in Housing Element updates. This is something that the City of Downey supports and seeks to attain. However, the City's goal is not only to promote housing but, to promote quality housing that incorporates the mixed housing types into the community overall. The City looks at long term incorporation of all current and future residents into the

community through continuing to offer the same services to all residents throughout the community. The potentially significant influx of new residents will likely result in increased costs to the City due to required improvements and maintenance of infrastructure as well as an increased demand of Police, Fire, and Recreation services in order to continue to provide the same level of service to all residents. This is a commitment that the City is willing to undertake for the quality of life for its residents but, a fair allocation dispersal will ease the impact of this future cost.

Sincerely,

CITY OF DOWNEY



Blanca Pacheco  
Mayor



SOUTHERN CALIFORNIA  
ASSOCIATION OF GOVERNMENTS  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017  
T (213) 236-1800  
www.scag.ca.gov

September 18, 2019

Mr. Doug McCauley  
Acting Director  
Housing & Community Development (HCD)  
2020 W. El Camino Ave.  
Sacramento, CA 95833

Subject: SCAG’s Objection to HCD’s Regional Housing Need Determination

Dear Mr. McCauley,

This letter represents the Southern California Association of Governments (SCAG)’s formal objection to HCD’s Regional Housing Need Determination as submitted to SCAG on August 22, 2019 and is made in accordance with Government Code Section 65584.01(c)(2)(A) and (B). At the outset, please know that SCAG is fully aware that the State of California is in the midst of a housing crisis and that resolving this crisis requires strong partnerships with state, regional and local entities in addition to private and non-profit sectors.

As such, SCAG desires to be an active and constructive partner with the State and HCD on solving our current housing crisis, and this objection should not suggest otherwise. We are in fact currently setting up a housing program that will assist our local jurisdictions on activities and policies that will lead to actual housing unit construction.

In the context of the 6<sup>th</sup> cycle Regional Housing Needs Assessment (RHNA) process, SCAG appreciates the collaboration with HCD as reflected in the numerous consultation sessions on the regional determination and other staff engagement on housing issues with the objective of making RHNA a meaningful step toward addressing our housing crisis.

As you are aware, HCD transmitted its Regional Housing Needs Determination of 1,344,740 units for the SCAG region last month. This number reflects the housing units that local jurisdictions in the region must plan for during the 8-year period from October 2021 to October 2029. At the September 5, 2019 meeting, SCAG Regional Council authorized staff to file an objection to HCD on regional housing need determination pursuant to Government Code Section 65584.01(c).

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*I would like to note that SCAG's objection focuses on the process and adherence to state housing law requirements and not necessarily to the regional housing need determination number. The ultimate aim of this objection, as discussed at length by the Regional Council, is to ensure the most technically and legally credible basis for a regional determination so that the 197 local jurisdictions in the SCAG region can approach the difficult task of zoning to accommodate regional needs with the backing of the most robust and realistic target that is possible.*

One of our major concerns is that HCD did not base its determination on SCAG's RTP/SCS Growth Forecast, which was inconsistent with Government Code 65584.01(c)(2)(A). Another major concern is that pursuant to Government Code 65584.01(c) (2) (B), HCD's determination of housing need in the SCAG region is not a reasonable application of the methodology and assumptions described in statute. Specifically, HCD compared household overcrowding and cost-burden rates in the SCAG region to national averages rather than to rates in comparable regions as statutorily required. These and two additional basis for objections are described in detail in the section below which also includes a deduction for household growth on tribal land and a concern that the vacancy rate standards used by HCD are not substantiated by data, analysis, or literature. In addition, the attached EXCEL worksheet and technical documentation contain SCAG's alternative proposed 6th cycle RHNA determination, which would consist of a range of total housing unit need between 823,808 and 920,772.

## **BASIS FOR SCAG OBJECTION**

### **Use of SCAG's Population Forecast**

HCD did not base its determination on SCAG's RTP/SCS Growth Forecast, which was provided in the original consultation package and via follow-up email to HCD. Government Code 65584.01(a) indicates [emphasis added]:

*“(a) The department’s determination shall be based upon population projections produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans, in consultation with each council of governments. **If the total regional population forecast for the projection year, developed by the council of governments and used for the preparation of the regional transportation plan, is within a range of 1.5 percent of the total regional population forecast for the projection year by the Department of Finance, then the population forecast developed by the council of governments shall be the basis from which the department determines the existing and projected need for housing in the region.** If the difference between the total population projected by the council of governments and the total population projected for the region by the Department of Finance is greater than 1.5 percent, then the department and the council of governments shall meet to discuss variances in methodology used for population projections and seek agreement on a population projection for the region to be used as a basis for determining the existing and projected housing need for the region. If no agreement is reached, then the population projection for the region shall be the population projection for the region prepared by the Department of Finance as may be modified by the department as a result of discussions with the council of governments.”*

SCAG projects total regional population to grow to 20,725,878 by October, 2029. SCAG's projection differs from Department of Finance (DOF) projection of 20,689,591, which was issued by DOF in May, 2018, by 0.18%. The total population provided in HCD's determination is 20,455,355, reflecting an updated DOF projection, differs from SCAG's projection by 1.32%. As SCAG's total projection is within the statutory tolerance of 1.5%, accordingly HCD is to use SCAG's population forecast.

While HCD has emphasized that consistency in approach to the 6<sup>th</sup> cycle RHNA across regions is a priority, deference to the Council of Governments' forecast as specified in statute is an important aspect of regional planning. Federal requirements for SCAG's Regional Transportation Plan necessitate a forecast of population, households, and employment for evaluating future land use patterns and measuring future travel demand as well as air quality conformity under the federal Clean Air Act. In addition, under SB 375, the State requires SCAG to develop a Sustainable Communities Strategy which is a coordination of transportation and land use in the regional planning process to achieve State's climate goals. Both federal and State requirements are predicated on SCAG's forecast of population, households and employment.

As a result, SCAG has a long-established and well-respected process for producing a balanced forecast of population, households, and employment for the region, the details of which can be found in each Regional Transportation Plan (e.g. [http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS\\_DemographicsGrowthForecast.pdf](http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf)). SCAG's quadrennial growth forecast begins with a consensus on appropriate assumptions of fertility, migration, immigration, household formation, and job growth by a panel of state and regional experts including members of DOF's Demographic Research Unit. In addition, SCAG co-hosts an annual demographic workshop with the University of Southern California to keep state and regional experts and stakeholders apprised of demographic and economic trends (<https://www.scag.ca.gov/calendar/Pages/DemographicWorkshop.aspx>).

SCAG places a high priority on generating its own forecasts of population, households, and employment and ensuring the highest possible degree of consistency and integrity of its projections for transportation, land use, and housing planning purposes.

### **Use of Comparable Regions**

Pursuant to Government Code 65584.01(c)(2)(B), HCD's determination of housing need in the SCAG region is not a reasonable application of the methodology and assumptions described in statute. Specifically, HCD compared household overcrowding and cost-burden rates in the SCAG region to national averages rather than to rates in comparable regions as statutorily required.

SCAG's initial consultation package provided an approach using comparable regions to evaluate household overcrowding. SCAG staff met with HCD staff in-person in both Los Angeles and Sacramento to discuss adjustment criteria and how to define a comparable region to Southern California, as our region's size precludes a straightforward comparison. At the direction of HCD, SCAG staff refined its methodology for identifying comparable regions and provided a state-of-the-practice analysis supported by recent demographic and economic literature which determined

that the most appropriate comparison to the SCAG region would be an evaluation against the San Jose, New York, San Francisco, Miami, Seattle, Chicago, San Diego, Washington D.C., Houston, and Dallas metropolitan areas. Despite this collaboration on the subject between HCD and SCAG, HCD elected to reject this approach and instead used national average statistics, which include small metropolitan areas and rural areas having little in common with Southern California.

HCD's choice to use national averages:

- Is inconsistent with the statutory language of SB 828, which added the comparable region standard to RHNA law in order to improve the technical robustness of measures of housing need.
- Is inconsistent with empirical data as economic and demographic characteristics differ dramatically based on regional size and context. For comparison, the median-sized metropolitan region in the country is Fargo, North Dakota with a population of 207,500. That is not a meaningful basis of comparison for the nation's largest MPO.
- Is inconsistent with HCD's own internal practice for the 6<sup>th</sup> cycle of RHNA. The regional need determination for the Sacramento Area Council of Governments (SACOG), issued on July 18, 2019, was the first 6<sup>th</sup> cycle RHNA determination following SB 828's inclusion of the comparable region standard. During their consultation process with HCD, SACOG also produced a robust technical analysis to identify comparable regions for the purposes of using overcrowding and cost-burden statistics to determine regional housing needs. However, HCD's final determination for SACOG used this analysis while the SCAG region was held to a different and less reasonable standard.

### Improved Vacancy Rate Comparison

HCD seemingly uses unrealistic comparison points to evaluate healthy market vacancy, which is also an unreasonable application of the methodology and assumptions described in statute. While SB 828 specifies a vacancy rate for a healthy rental housing market as no less than 5 percent, healthy market vacancy rates for for-sale housing are not specified. HCD's practice is to compare actual, ACS vacancy rates for the region versus a 5 percent total vacancy rate (i.e. owner and renter markets combined).

During the consultation process, SCAG discussed this matter with HCD staff and provided several points of comparison including historical data, planning standards, and comparisons with other regions. In addition, SCAG staff illustrated that given tenure shares in the SCAG region, HCD's suggestion of a 5 percent total vacancy rate is mathematically equivalent to an 8 percent rental market vacancy rate plus a 2.25 percent for-sale housing vacancy rate. However, in major metropolitan regions, vacancy rates this high are rarely experienced outside of severe economic recessions such as the recent, housing market-driven Great Recession. Given the region's current housing shortage, the high volume of vacant units envisioned in HCD's planning target would be rapidly absorbed, making it an unrealistic standard.

SCAG staff's original suggestion of 5 percent rental vacancy and 1.5 percent for-sale vacancy (resulting in a 3.17 percent total vacancy rate based on current tenure shares) is in fact *higher* than the observed rate in the comparable regions defined above. It is also above Federal Housing Authority standards for regions experiencing slow or moderate population growth. It is also above the very liberal standard of 6 percent for for-rent housing and 2 percent for for-sale housing suggested by the California Office of Planning and Research (equivalent to 3.90 percent total vacancy based on SCAG tenure shares) which would also be a more reasonable application of the methodology.<sup>1</sup>

### **Additional Considerations**

In addition to the three key points above, SCAG's proposed alternative includes several other corrections to technical shortcomings in HCD's analysis of regional housing needs.

1. HCD's evaluation of replacement need is based on an arbitrary internal standard of 0.5 percent to 5.0 percent of total housing units. 2010-2019 demolition data provided by DOF suggest that over an 8.25-year period, it is reasonable to expect that 0.14 percent of the region's total housing units will be demolished, but not replaced. This would form the basis of a more reasonable housing needs determination, as DOF's survey represents the most comprehensive and robust data available.
2. Anticipated household growth on tribal land was not excluded from the regional determination as indicated in the consultation package and follow-up communications. Tribal entities within the SCAG region have repeatedly requested that this estimate be excluded from the RHNA process entirely since as sovereign nations, state law does not apply. SCAG's proposed approach is to subtract estimates of household growth on tribal land from the regional determination and ensure that these figures are also excluded from local jurisdictions' annual progress reports (APRs) of new unit construction to HCD during the 6<sup>th</sup> cycle.
3. A refinement to the adjustment for cost burden would yield a more reasonable determination of regional housing needs. SCAG has repeatedly emphasized the shortcomings of and overlap across various ACS-based measures of housing need. Furthermore, the relationship between new unit construction and cost burden is poorly understood (i.e., what will be the impact of new units on cost, and by extension, cost-burden). Nonetheless, SCAG recognizes that the region's cost burden exceeds that of comparable regions and proposes one modification to HCD's methodology, which currently considers cost burden separately by lower and higher income categories.

While housing security is dependent on income, it is also heavily dependent on tenure. While spending above 30 percent of gross income on housing for renters can reflect true housing insecurity, spending above this threshold for owners is substantially less problematic. This is particularly true for higher income homeowners, who generally benefit from housing shortages as it results in home value appreciation. Thus, a more reasonable application of cost burden

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<sup>1</sup> See Nelson, AC. (2004), *Planner's Estimating Guide Projecting Land-Use and Facility Needs*. Planners Press, American Planning Association, Chicago. P. 25.



statistics would exclude cost-burden experienced by moderate and above-moderate owner households and instead make an adjustment based on three of the four income and tenure combinations: lower-income renters, higher-income renters, and lower-income owners.

4. From our review, HCD's data and use of data is not current. In large metropolitan regions, there is no reasonable basis for using 5-year ACS data, which reflects average conditions from 2013 to 2017. For cost-burden adjustments, HCD relies on 2011-2015 CHAS data. By the beginning of the 6<sup>th</sup> cycle of RHNA, some of the social conditions upon which the determination is based will be eight years old.

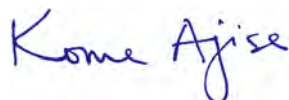
During the consultation process, SCAG staff provided HCD with Excel-version data of all inputs needed to replicate their methodology using ACS 2017 1-year data (the most recent available); however, this was not used. The Census bureau is scheduled to release ACS 2018 1-year data on September 26, 2019. SCAG staff would support replicating the same analysis, but substituting 2018 data when it becomes available in order to ensure the most accurate estimates in planning for the region's future.

Finally, given that the manner and order in which modifications are made affects the total housing need, the attachments demonstrate two alternatives with varying interpretations of three of the above points (see boldface, red text in attachments):

- Vacancy rate comparison – SCAG's originally proposed values versus an alternative which emerged from the consultation process
- Replacement need – DOF survey value versus HCD's current practice
- Cost burden measure – whether or not to include higher-income homeowners in this adjustment

We appreciate your careful consideration of this objection. RHNA is a complex process and we recognize the difficult positions that both SCAG and HCD are in but are hopeful that our agencies can reach a reasonable conclusion with respect to the regional need determination. Please contact me if you have questions. I look forward to continuing our close partnership to address the housing crisis in our state.

Sincerely,



Kome Ajise  
Executive Director

Attachments

1. SCAG Alternative Determination
2. Excel version: SCAG Alternative Determination and supporting data
3. HCD Letter on Regional Need Determination, August 22, 2019

**Attachment 1  
SCAG Alternative Determination**

|    |  |                                     |                                    |                             |                   |
|----|--|-------------------------------------|------------------------------------|-----------------------------|-------------------|
| 1  | <b>OPTION A: SCAG region housing needs, June 30 2021-October 1 2029 (8.25 Years)</b> |                                     |                                    |                             |                   |
| 2  | <b>Population: Oct 1, 2029 (SCAG 2020 RTP/SCS Forecast)</b>                          |                                     |                                    |                             | <b>20,725,878</b> |
| 3  | <i>- Less Group Quarters Population (SCAG 2020 RTP/SCS Forecast)</i>                 |                                     |                                    |                             | <i>-327,879</i>   |
| 4  | <b>Household (HH) Population, Oct 1, 2029</b>  |                                     |                                    |                             | <b>20,397,998</b> |
|    |  | <b>SCAG Projected HH Population</b> | <b>Headship rate - see Table 2</b> | <b>Projected Households</b> |                   |
|    | <b>Household Formation Groups</b>  |                                     |                                    |                             |                   |
|    |  | <b>20,397,998</b>                   |                                    | <b>6,668,498</b>            |                   |
|    | <b>under 15 years</b>  | 3,812,391                           |                                    | n/a                         |                   |
|    | <b>15 - 24 years</b>   | 2,642,548                           |                                    | 147,005                     |                   |
|    | <b>25 - 34 years</b>   | 2,847,526                           |                                    | 864,349                     |                   |
|    | <b>35 - 44 years</b>   | 2,821,442                           |                                    | 1,304,658                   |                   |
|    | <b>45 - 54 years</b>   | 2,450,776                           |                                    | 1,243,288                   |                   |
|    | <b>55 - 64 years</b>   | 2,182,421                           |                                    | 1,116,479                   |                   |
|    | <b>65 -74 years</b>  | 1,883,181                           |                                    | 1,015,576                   |                   |
|    | <b>75 - 84 years</b>   | 1,167,232                           |                                    | 637,415                     |                   |
|    | <b>85+</b>   | 590,480                             |                                    | 339,727                     |                   |
| 5  | <b>Projected Households (Occupied Unit Stock)</b>                                    |                                     |                                    |                             | <b>6,668,498</b>  |
| 6  | <b>+ Vacancy</b>   | Owner                               | Renter                             |                             |                   |
|    | Tenure Share (ACS 2017 1-year)   | 52.43%                              | 47.57%                             |                             |                   |
|    | Households by Tenure   | 3,496,058                           | 3,172,440                          |                             |                   |
|    | Healthy Market Vacancy Standard  | <b>1.50%</b>                        | <b>5.00%</b>                       |                             |                   |
|    | SCAG Vacancy (ACS 2017 1-year)   | 1.13%                               | 3.30%                              |                             |                   |
|    | Difference   | 0.37%                               | 1.70%                              |                             |                   |
|    | Vacancy Adjustment   | 12,953                              | 53,815                             |                             | 66,768            |
| 7  | + Overcrowding (Comparison Point vs. Region ACS %)                                   | 5.20%                               | 9.82%                              | 4.62%                       | 308,264           |
| 8  | + Replacement Adj (Actual DOF Demolitions)   |                                     | <b>0.14%</b>                       |                             | 9,335             |
|    | - Household Growth on Tribal Land (SCAG Estimate)                                    |                                     |                                    |                             | -2,766            |
| 9  | <i>- Occupied Units (HHs) estimated June 30, 2021 (from DOF data)</i>                |                                     |                                    |                             | <i>-6,250,261</i> |
| 10 | + Cost-burden Adjustment (Comparison Point vs. Region)                               |                                     |                                    |                             | <b>23,969</b>     |
|    | <b>6th Cycle Regional Housing Need Assessment (RHNA)</b>                             |                                     |                                    |                             | <b>823,808</b>    |

|    |  |                                     |                                    |                             |                |
|----|--|-------------------------------------|------------------------------------|-----------------------------|----------------|
| 1  | <b>OPTION B: SCAG region housing needs, June 30 2021–October 1 2029 (8.25 Years)</b> |                                     |                                    |                             |                |
| 2  | <b>Population: Oct 1, 2029 (SCAG 2020 RTP/SCS Forecast)</b>                          |                                     |                                    |                             | 20,725,878     |
| 3  | - Less Group Quarters Population (SCAG 2020 RTP/SCS Forecast)                        |                                     |                                    |                             | -327,879       |
| 4  | <b>Household (HH) Population, Oct 1, 2029</b>  |                                     |                                    |                             | 20,397,998     |
|    | <b>Household Formation Groups</b>  | <b>SCAG Projected HH Population</b> | <b>Headship rate - see Table 2</b> | <b>Projected Households</b> |                |
|    |  | 20,397,998                          |                                    | 6,668,498                   |                |
|    | under 15 years   | 3,812,391                           |                                    | n/a                         |                |
|    | 15 - 24 years  | 2,642,548                           |                                    | 147,005                     |                |
|    | 25 - 34 years  | 2,847,526                           |                                    | 864,349                     |                |
|    | 35 - 44 years  | 2,821,442                           |                                    | 1,304,658                   |                |
|    | 45 - 54 years  | 2,450,776                           |                                    | 1,243,288                   |                |
|    | 55 - 64 years  | 2,182,421                           |                                    | 1,116,479                   |                |
|    | 65 -74 years   | 1,883,181                           |                                    | 1,015,576                   |                |
|    | 75 - 84 years  | 1,167,232                           |                                    | 637,415                     |                |
|    | 85+  | 590,480                             |                                    | 339,727                     |                |
| 5  | <b>Projected Households (Occupied Unit Stock)</b>                                    |                                     |                                    |                             | 6,668,498      |
| 6  | + Vacancy  | Owner                               | Renter                             |                             |                |
|    | Tenure Share (ACS 2017 1-year)   | 52.43%                              | 47.57%                             |                             |                |
|    | Households by Tenure   | 3,496,058                           | 3,172,440                          |                             |                |
|    | Healthy Market Vacancy Standard  | 2.00%                               | 6.00%                              |                             |                |
|    | SCAG Vacancy (ACS 2017 1-year)   | 1.13%                               | 3.30%                              |                             |                |
|    | Difference   | 0.87%                               | 2.70%                              |                             |                |
|    | Vacancy Adjustment   | 30,433                              | 85,540                             |                             | 115,973        |
| 7  | + Overcrowding (Comparison Point vs. Region ACS %)                                   | 5.20%                               | 9.82%                              | 4.62%                       | 308,264        |
| 8  | + Replacement Adj (HCD minimum standard)   |                                     | 0.50%                              |                             | 33,340         |
|    | - Household Growth on Tribal Land (SCAG Estimate)                                    |                                     |                                    |                             | -2,766         |
| 9  | - Occupied Units (HHs) estimated June 30, 2021 (from DOF data)                       |                                     |                                    |                             | -6,250,261     |
| 10 | + Cost-burden Adjustment (Comparison Point vs. Region)                               |                                     |                                    |                             | 47,724         |
|    | <b>6th Cycle Regional Housing Need Assessment (RHNA)</b>                             |                                     |                                    |                             | <b>920,772</b> |

|     |  |
|-----|--|
| 1   | Projection period: Gov. Code 65588(f) specifies RHNA projection period start is December 31 or June 30, whichever date most closely precedes end of previous RHNA projection period end date. RHNA projection period end date is set to align with planning period end date. The planning period end date is eight years following the Housing Element due date, which is 18 months following the Regional Transportation Plan adoption rounded to the 15th or end of the month.   |
| 2-5 | Population, Group Quarters, Household Population, & Projected Households: Pursuant to Government Code Section 65584.01, projections were extrapolated from SCAG's Regional Transportation Plan projections. <u>Population</u> reflects total persons. <u>Group Quarter Population</u> reflects persons in a dormitory, group home, institution, military, etc. that do not require residential housing. <u>Household Population</u> reflects persons requiring residential housing. <u>Projected Households</u> reflect the propensity of persons, by age-groups, to form households at different rates based on Census trends.  |
| 6   | Vacancy Adjustment: Pursuant to Government Code 65584.01, a 5% minimum is considered to be healthy market vacancy in the for-rent housing market. Vacancy rates in the for-sale market are unspecified in statute. <b>SCAG's analysis of vacancy rates suggests a healthy market standard of 5% for fore-rent housing and 1.5% for for-sale housing. After extensive consultation with HCD, a review of historical trends, regional and national comparison, and various planning standards, a more liberal vacancy standard of 6% for for-rent housing and 2% for for-sale housing may also be supported by this analysis.</b> These standards are compared against ACS 2017 1-year data based on the renter/owner share in the SCAG region.  |
| 7   | Overcrowding Adjustment: In regions where overcrowding is greater than the Comparable Region Rate, an adjustment is applied based on the amount the region's overcrowding rate (9.82%) exceeds the Comparable Region Rate (5.20%). Data is from 2017 1-year ACS.   |
| 8   | Replacement Adjustment: A replacement adjustment is applied based on the current 10-year average % of demolitions according to local government annual reports to Department of Finance. <b>While these data suggest an adjustment of 0.14% is most appropriate, SCAG recognizes that HCD's internal practice is to use an adjustment factor of 0.5%.</b>  |
| 9   | Occupied Units: Reflects DOF's estimate of occupied units at the start of the projection period (June 30, 2021).   |
| 10  | Cost Burden Adjustment: A cost-burden adjustment is applied to the projected need by comparing the difference in cost-burden by income and tenure group for the region to the cost-burden by income and tenure group for comparable regions. Data are from 2017 1-year ACS and the ACS \$50,000/year household income threshold is used to distinguish between lower and higher income groups. The lower income RHNA is increased by the percent difference between the region and the comparison region cost burden rate for households earning approximately 80% of area median income and below (88.89%-84.39%=4.51% for renters and 27.33%-20.97%=6.36% for owners), then this difference is applied to very low- and low-income RHNA proportionate to the share of the population these groups currently represent (Very Low=63% of lower, Low=37% of lower). The higher income RHNA is increased by the percent difference between the region and the comparison region cost burden rate (67.15%-65.53%=1.62% for renters and 23.78%-17.06%=6.72% for owners) for households earning above 80% Area Median Income, then this difference is applied to moderate and above moderate income RHNA proportionate to the share of the population these groups currently represent (Moderate=29% of higher, Above Moderate=71% of higher). <b>SCAG's analysis of the cost-burden measure suggests that it may be less appropriate to apply for higher-income owners and it may be excluded from the adjustment.</b> |

| <b>Option A: Regional Housing Need Allocation (RHNA) Determination</b> |                |                               |  |
|--|----------------|-------------------------------|--|
| <b>SCAG Region</b>   |                |                               |  |
| <b>June 30, 2021 through October 1, 2029</b>                           |                |                               |  |
| <u>Income Category</u>   | <u>Percent</u> | <u>Housing Unit Need</u>      |  |
| Very-Low *   | 25.8%          | 212,284                       |  |
| Low  | 15.1%          | 124,375                       |  |
| Moderate   | 17.1%          | 140,601                       |  |
| Above-Moderate   | 42.1%          | 346,547                       |  |
| <b>Total</b>   | <b>100.0%</b>  | <b>823,808</b>                |  |
| * Extremely-Low  | 14.6%          | included in Very-Low Category |  |

| <b>Option B: Regional Housing Need Allocation (RHNA) Determination</b> |                |                               |  |
|--|----------------|-------------------------------|--|
| <b>SCAG Region</b>   |                |                               |  |
| <b>June 30, 2021 through October 1, 2029</b>                           |                |                               |  |
| <u>Income Category</u>   | <u>Percent</u> | <u>Housing Unit Need</u>      |  |
| Very-Low *   | 25.8%          | 231,084                       |  |
| Low  | 15.1%          | 135,390                       |  |
| Moderate   | 17.1%          | 159,982                       |  |
| Above-Moderate   | 42.1%          | 394,316                       |  |
| <b>Total</b>   | <b>100.0%</b>  | <b>920,772</b>                |  |
| * Extremely-Low  | 14.6%          | included in Very-Low Category |  |

*Income Distribution* : Income categories are prescribed by California Health and Safety Code (Section 50093, et.seq.). Percents are derived based on ACS reported household income brackets and county median income, then adjusted based on the percent of cost-burdened households in the region compared with the percent of cost burdened households nationally.



# Double Counting in the Latest Housing Needs Assessment



[View PDF Report](#)



**Do the Math: The state has ordered more than 350 cities to prepare the way for more than 2 million homes by 2030.**

But what if the math is wrong?

Senate Bill 828, co-sponsored by the Bay Area Council and Silicon Valley Leadership Group, and authored by state Sen. Scott Wiener in 2018, has inadvertently doubled the “Regional Housing Needs Assessment” in California.

Use of an incorrect vacancy rate and double counting, inspired by SB-828, caused the state’s Department of Housing and Community Development (HCD) to exaggerate by more than 900,000 the units needed in SoCal, the Bay Area and the Sacramento area.

The state’s approach to determining the housing need must be defensible and reproducible if cities are to be held accountable. Inaccuracies on this scale mask the fact that cities and counties are surpassing the state’s market-rate housing targets, but falling far short in meeting affordable housing targets. The inaccuracies obscure the real problem and the associated solution to the housing crisis—the funding of affordable housing.



# **Do the Math: The state has ordered more than 350 cities to prepare the way for more than 2 million homes by 2030. But what if the math is wrong?**

**Senate Bill 828, co-sponsored by the Bay Area Council and Silicon Valley Leadership Group, and authored by state Sen. Scott Wiener in 2018, has inadvertently doubled the “Regional Housing Needs Assessment” in California.**

Use of an incorrect vacancy rate and double counting, inspired by SB-828, caused the state’s Department of Housing and Community Development (HCD) to exaggerate by more than 900,000 the units needed in SoCal, the Bay Area and the Sacramento area.

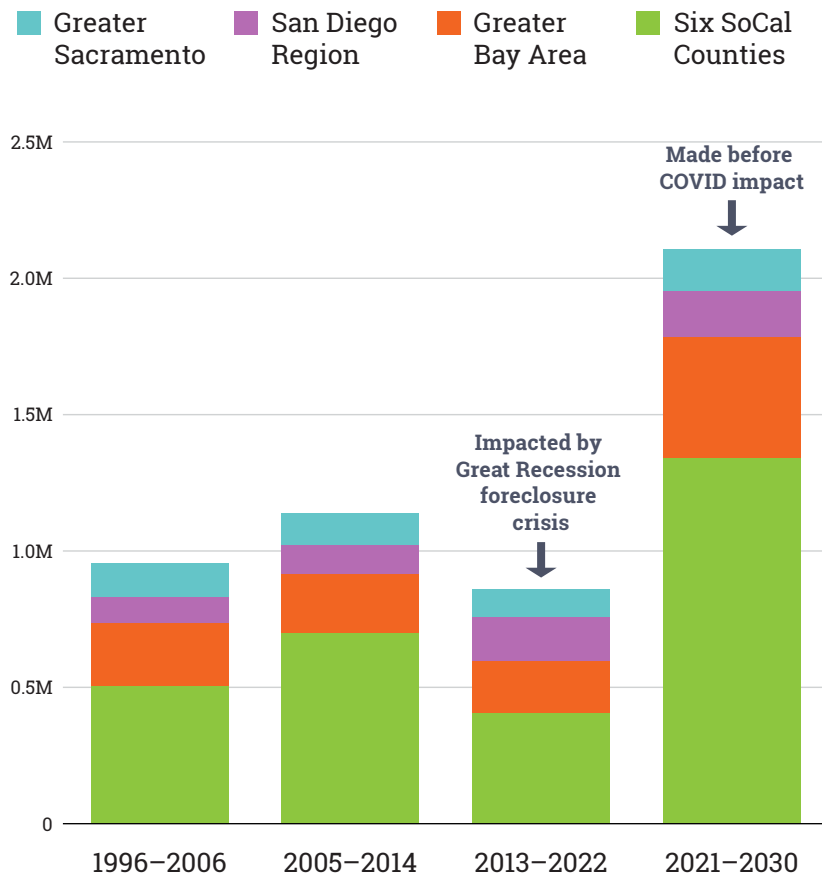
The state’s approach to determining the housing need must be defensible and reproducible if cities are to be held accountable. Inaccuracies on this scale mask the fact that cities and counties are surpassing the state’s market-rate housing targets, but falling far short in meeting affordable housing targets. The inaccuracies obscure the real problem and the associated solution to the housing crisis—the funding of affordable housing.



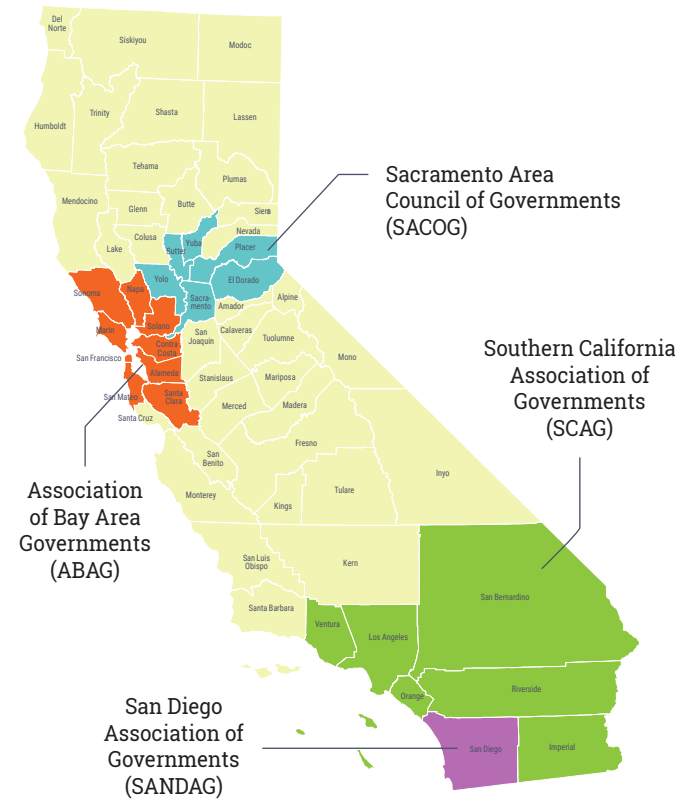
# Double counting (not surprisingly) doubled the assessed housing need for the four major planning regions.

Every five to eight years the Department of Housing and Community Development (HCD) supervises and publishes the results of a process referred to as the Regional Housing Needs Assessment (RHNA). Four regional planning agencies cover the 21 most urban counties and account for 80% of California’s housing. All four regions saw a significant jump in the state’s assessment of their housing need for the years 2021 to 2030.

### Housing Units Needed According to the State, (1996–2030)



### Four Regions Contain 80% of the State’s Housing



# The double count, an unintended consequence of Senate Bill 828, has exaggerated the housing need by more than 900,000 units in the four regions below.

California plans for its housing needs in “cycles.” The four regions are on cycles that last roughly eight years with staggered start dates. In the 2021–2030 housing cycle, errors introduced by language in SB-828 nearly equal the entire 1.15M units of new housing required during the 2013–2022 “cycle.” As illustrated, Southern California and the Bay Area are the most impacted by the state’s methodology errors.



# Senate Bill 828 was drafted absent a detailed understanding of the Department of Finance’s methodology for developing household forecasts, and absent an understanding of the difference between rental and home-owner vacancies. These misunderstandings have unwittingly ensured a series of double counts.

## SB-828 MISTAKENLY ASSUMED:

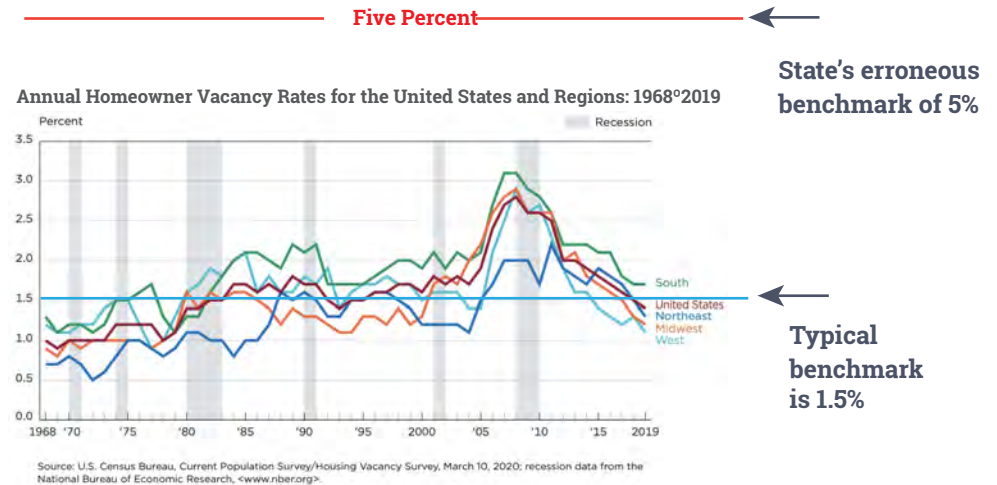
## THE REALITY IS:

1. SB-828 wrongly assumed ‘existing housing need’ was not evaluated as part of California’s previous Regional Housing Need Assessments, or RHNA. There was an assumption that only future need had been taken into account in past assessments. (In fact, as detailed in The Reality section, the state’s existing housing need was fully evaluated in previous RHNA assessment cycles).

1. Existing housing need has long been incorporated in California’s planning cycles. It has been evaluated by comparing existing vacancy rates with widely accepted benchmarks for healthy market vacancies (rental and owner-occupied). The difference between actual and benchmark is the measure of housing need/surplus in a housing market. Confusion about the inclusion of “existing need” may have arisen because vacancy rates at the time of the last assessment of housing need (“the 5th cycle”) were unusually high (higher than the healthy benchmarks) due to the foreclosure crisis of 2007–2010, and in fact, the vacancy rates suggested a surplus of housing. So, in the 5th cycle the vacancy adjustment had the effect of lowering the total housing need. Correctly seeing the foreclosure crisis as temporary, the state Department of Finance did not apply the full weight of the surplus, but instead assumed a percentage of the vacant housing would be absorbed by the time the 5th cycle began. The adjustment appears in the 5th cycle determinations, not as ‘Existing Housing Need’ but rather as “Adjustment for Absorption of Existing Excess Vacant Units.”

2. SB-828 wrongly assumed a 5% vacancy rate in owner-occupied housing is healthy (as explained in the column on the right, 5% vacancy in owner-occupied homes is never desirable, and contradicts Government Code 65584.01(b)(1)(E) which specifies that a 5% vacancy rate applies only to the rental housing market).

2. While 5% is a healthy benchmark for rental vacancies, it is unhealthy for owner-occupied housing (which typically represents half of existing housing). Homeowner vacancy in the U.S. has hovered around 1.5% since the ‘70s, briefly reaching 3% during the foreclosure crisis. However, 5% is well outside any healthy norm, and thus does not appear on the Census chart (to the right) showing Annual Homeowner Vacancy Rates for the United States and Regions: 1968–2019.



3. SB-828 wrongly assumed overcrowding and cost-burdening had not been considered in Department of Finance projections of housing need. The bill sought to redress what it mistakenly thought had been left out by requiring regional planning agencies to report overcrowding and cost-burdening data to the Dept. of Housing and Community Development (as explained in the right column).

3. Unknown to the authors of SB-828, the Department of Finance (DOF) has for years factored overcrowding and cost-burdening into their household projections. These projections are developed by multiplying estimated population by the headship rate (the proportion of the population who will be head of a household). The Department of Finance (DOF) in conjunction with the Department of Housing and Community Development (HCD) has documented its deliberate decision to use higher headship rates to reflect optimal conditions and intentionally “alleviate the burdens of high housing cost and overcrowding.” Unfortunately, SB-828 has caused the state to double count these important numbers.

# The forced double-counting errors are significant.\*

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## 1. Incorrect use of a 5% benchmark vacancy rate for owner-occupied housing.

The vacancy rate was incorrectly used for both existing and projected owner-occupied households.

**+ 229,000**  
housing units

---

## 2. Current vacancies were assumed to exist in household projections.

This error is unrelated to SB-828, but is an accounting error introduced by HCD methodology.

**- 22,000**  
housing units

---

## 3. Overcrowding and cost-burdening were double counted.\*\*

In addition to the household projection methodology outlined by the Department of Finance (shown to account for overcrowding and cost-burdening), the matter is also mentioned in meeting notes available on the Association of Bay Area Government's (ABAG) website.\*\*\*

Quote from ABAG's Housing Methodology Committee Agenda Packet for the 4th RHNA Cycle, July 2006

"There was also a lot of discussion about the headship rates used by HCD/DOF. Several people commented that headship rates in the Bay Area are generally lower than the State's estimates because the region's high housing costs limit household formation. In response, Mr. Fassinger noted that HCD uses these higher headship rates because the RHNA process is intended to alleviate the burdens of high housing cost and overcrowding."

Despite this, overcrowding and cost-burdening were counted a second time as adjustment factors required by SB-828.

**+ 734,000**  
housing units

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**TOTAL:** **+ 941,000**  
housing units

\* All errors are rounded to the nearest thousand.

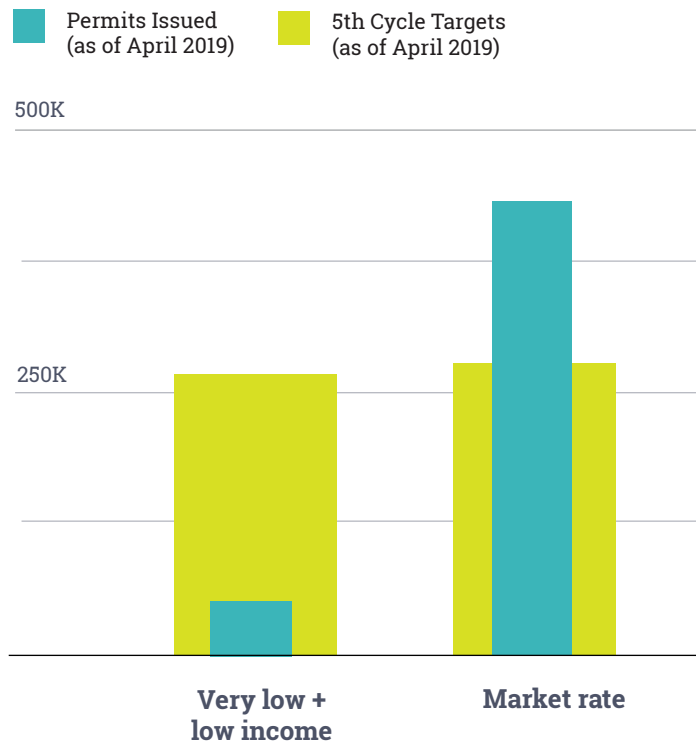
\*\* Overcrowding measures the number of households with more than 1 person per room. Cost-burdening measures the number of households that spend more than 30% of the household income on housing. Cost-burdening is measured by five income levels – extremely low, very low, low, moderate, above moderate

\*\*\* P-4 tables are created by the Department of Finance–Household Projection table 2020–2030 and their methodology is fully explained in 'read me' notes that accompany the table.

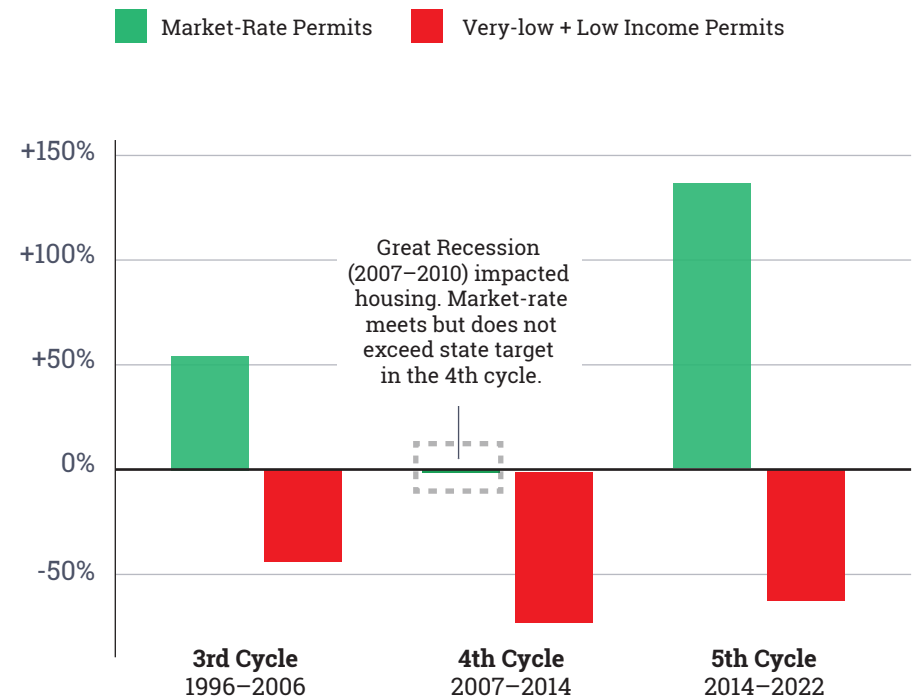
# The state's exaggerated targets unfortunately mask the real story: Decades of overachieving in market-rate housing has not reduced housing costs for lower income households.

The state has shown, with decades of data, that it cannot dictate to the market. The market is going to take care of itself. The state's responsibility is to take care of those left behind in the market's wake. Based on housing permit progress reports published by the Dept. of Housing and Community Development in July 2020, cities and counties in the four most populous regions continue to strongly outperform on the state's assigned market-rate housing targets, but fail to achieve even 20% of their low-income housing target. In the Bay Area where permit records have been kept since 1997, there is evidence that this housing permit imbalance has propagated through decades of housing cycles.

## Permit Progress in the 5th Cycle (2013-2022)\* (all 4 regions)



## Affordable Housing Languishes as Market-Rate Housing Overachieves (Bay Area only)\*



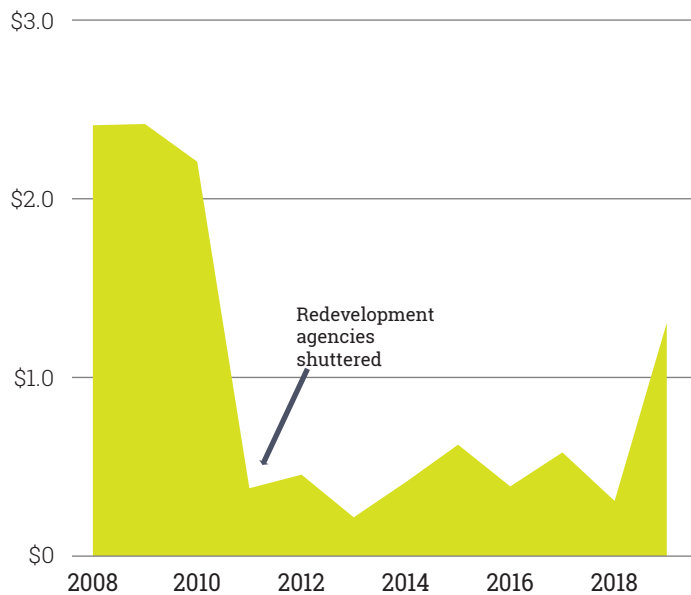
\* Based on permit progress reports published by the Dept of Housing and Community Development and updated July 2020, reporting progress through April 2019.

\*\* Only the Bay Area is shown because other regions have not kept detailed records of permit progress through the 3rd and 4th cycles.

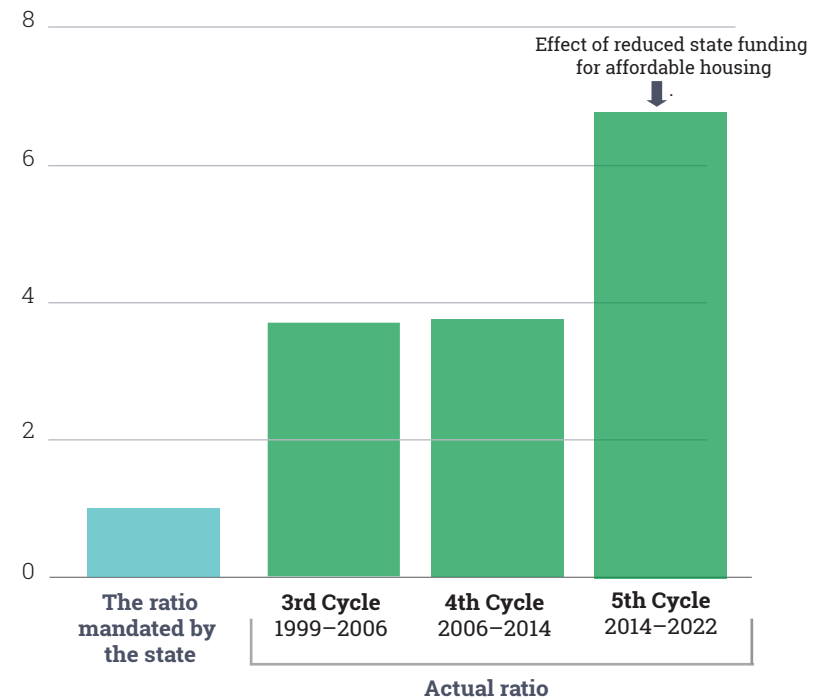
# It's clear. Market-rate housing doesn't need state incentives. Affordable housing needs state funding.

Cities are charged by the state to build one market-rate home for every one affordable home. But state laws, such as the density bonus law, incentivize developers to build market-rate units at a far higher rate than affordable units. As a result, California has been building four market-rate units for every one affordable unit for decades. And with the near-collapse of legislative funding for low-income housing in 2011, that ratio has grown to seven to eight market-rate units to each affordable unit. Yet we need one-to-one. This worsening situation can't be fixed by zoning or incentives which are the focus of many recent housing bills and only reinforce or worsen the ever-higher market-rate housing ratios. From the data it appears that the shortage of housing resulted not from a failure by cities to issue housing permits, but rather a failure by the state to fund and support affordable housing. Future legislative efforts should take note.

**State Funds for Affordable Housing, 2008–2019\***  
\$ Billion



**Market-Rate to Low-Income Housing Permits in the Bay Area has grown from a ratio of 4 : 1 to 7 : 1**  
(Bay Area only)\*\*



\* "The Defunding of Affordable Housing in California", Embarcadero Institute, update June 2020 [www.embarcaderoinstitute.com/reports/](http://www.embarcaderoinstitute.com/reports/)

\*\* Only Bay Area is shown because other regions have not kept detailed records of permit progress through the 3rd and 4th cycles. Data is from ABAG's permit progress reports for 3rd and 4th cycle and Dept. of Housing and Community Development's 5th cycle Annual Progress Report.

## Finally, since penalties are incurred for failing to reach state targets for housing permits, the methodology for developing these numbers must be transparent, rigorous and defensible.

Non-performance in an income category triggers a streamlined approval process per Senate Bill 35 (2017). These exaggerated 6th cycle targets will make it impossible for cities and counties to attain even their market-rate targets, ensuring market-rate housing will qualify for incentives and bonuses meant for low income housing. **Yet again low-income housing will lose out.** The state needs to correct the errors in the latest housing assessment, and settle on a consistent, defensible approach going forward.

### At Least Four Different Methodologies Have Been Used Simultaneously by the State to Discuss Housing Need: We Only Need One

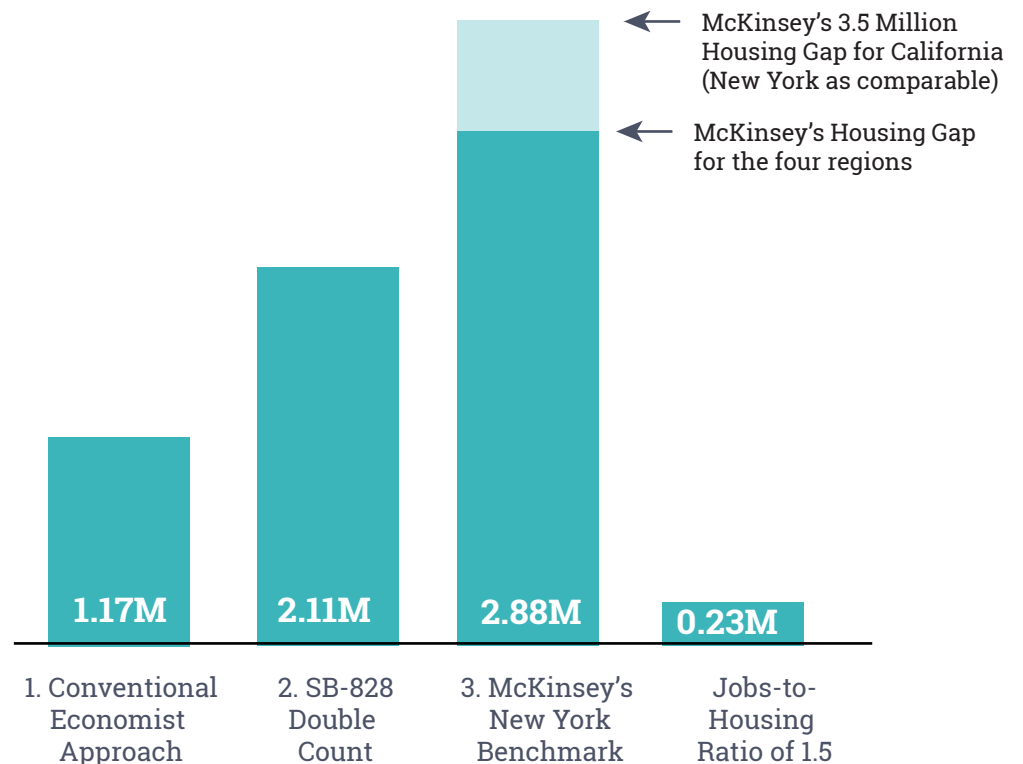
**1. The Conventional Economist Approach:** uses goldilocks (not too big, not too small, just right) benchmarks for vacancies - 1.5% for owner-occupied and 5% for rental housing.

**2. SB-828 Double Count:** incorrectly uses a benchmark of 5% vacancy for owner-occupied housing. It also double counts overcrowding and cost-burdening

**3. McKinsey's New York Benchmark:** the over-simplified approach generated an exaggerated housing gap of 3.5 Million for California. McKinsey multiplied California's population by New York's housing per capita to get 3.5M. New York is not a proper benchmark for California and NY's higher housing per capita is more reflective of NY's declining population rather than a healthy benchmark for housing

**4. Jobs-to-housing ratio of 1.5:** according to state planning agencies 1.5 is the optimal benchmark. Employment in the four regions is estimated to grow to 17 million by 2030 (job growth estimates prepared before COVID).\*\*

### Forecast 2030 Housing Need for the Four Regions



\* California's Employment Development Department (EDD) estimates employment by county through 2026. Using annualized growth (2016 to 2026) as a basis for future growth 2030 employment is estimated for the four regions.

\*\* The 17 million includes estimates of self employed, private household workers, farm and nonfarm employment. Occupations with employment below 100 in 2016 are excluded.

**How it Works : A multi-agency collaborative effort has generated past state housing targets. However, in 2018, SB-828 annointed the Dept. of Housing and Community Development with final veto powers.**

**STEP 1**

The Dept. of Finance (DOF) generates household forecasts by county based on population growth and headship rates. This is the step where overcrowding and cost-burdening are factored in .

Dept. of Finance (DOF)



**STEP 2**

The Dept. of Housing and Community Development (HCD) then takes the DOF household projections and adds in a healthy vacancy level (1.5% for owner-occupied, 5% for rental housing) to determine the number of housing units needed to comfortably accommodate the DOF household projections.

dept. of Housing and Community Development (HCD)



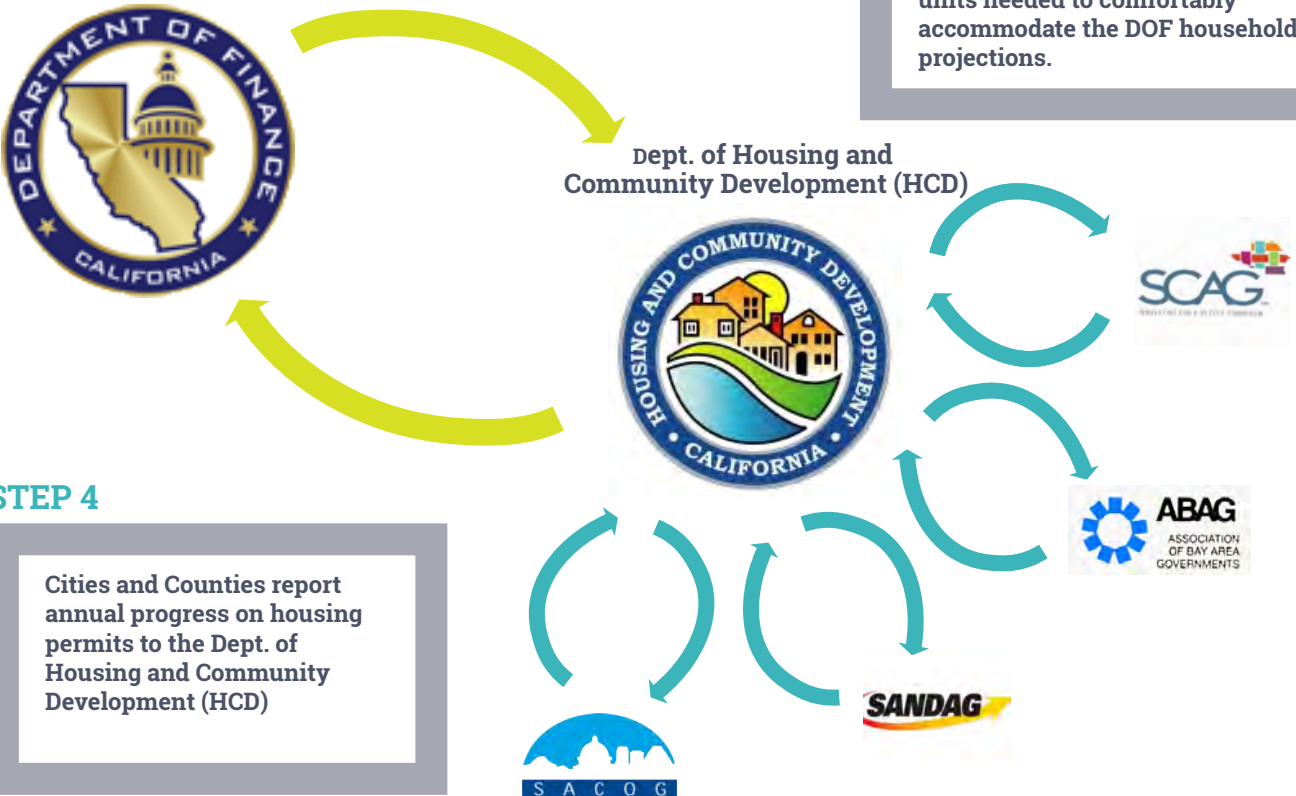
**STEP 3**

The regional agencies allocate housing targets to cities and counties in their jurisdiction. These allocations collectively meet their RHNA assessments, and are based on algorithms that may include employment, transit accessibility and local housing patterns



**STEP 4**

Cities and Counties report annual progress on housing permits to the Dept. of Housing and Community Development (HCD)



Attachment: Embarcadero Institute Report (Appeal of the Draft RHNA Allocation for the City of Downey)



**SB-828 introduced errors in Step 2 (when the Dept. of Housing and Community Development made adjustments to the Dept. of Finance’s household projections).**

Southern California and the Bay Area were most impacted by the double counting. San Diego was not assessed for cost-burdening although it is more cost-burdened than the Bay Area. It was perhaps overlooked because its assessment cycle began in July, 2018, a few months before SB-828 passed into law.

**The Department of Housing and Community and Development**

**1. Used a benchmark of 5% vacancy rate for BOTH owner-occupied and rental housing.**

|                           |          |                 |                                   |
|---------------------------|----------|-----------------|-----------------------------------|
| <b>Six SoCal Counties</b> | <b>=</b> | <b>+126,000</b> | <b>+ 228,000</b><br>housing units |
| <b>Greater Bay Area</b>   | <b>=</b> | <b>+59,000</b>  |                                   |
| <b>San Diego Area</b>     | <b>=</b> | <b>+23,000</b>  |                                   |
| <b>Greater Sacramento</b> | <b>=</b> | <b>+21,000</b>  |                                   |

**2. Assumed vacancies in household projections \***

|                           |          |                |                                  |
|---------------------------|----------|----------------|----------------------------------|
| <b>Six SoCal Counties</b> | <b>=</b> | <b>-13,000</b> | <b>- 22,000</b><br>housing units |
| <b>Greater Bay Area</b>   | <b>=</b> | <b>-4,000</b>  |                                  |
| <b>San Diego Area</b>     | <b>=</b> | <b>-2,000</b>  |                                  |
| <b>Greater Sacramento</b> | <b>=</b> | <b>-3,000</b>  |                                  |

**3. Double counted overcrowding and cost-burdening**

|                           |          |                 |                                   |
|---------------------------|----------|-----------------|-----------------------------------|
| <b>Six SoCal Counties</b> | <b>=</b> | <b>+578,000</b> | <b>+ 734,000</b><br>housing units |
| <b>Greater Bay Area</b>   | <b>=</b> | <b>+104,000</b> |                                   |
| <b>San Diego Area</b>     | <b>=</b> | <b>+39,000</b>  |                                   |
| <b>Greater Sacramento</b> | <b>=</b> | <b>+13,000</b>  |                                   |

\* P-4 tables are created by the Department of Finance—Household Projection table 2020–2030 and their methodology is fully explained in ‘read me’ notes that accompany the table  
 \*\* Overcrowding measures the number of households with more than 1 person per room. Cost-burdening measures the number of households that spend more than 30% of the household income on housing. Cost-burdening is measured by five income levels—extremely low, very low, low, moderate, above moderate.

## Detailed explanation of the errors using SoCal Counties as an example: First—the correct approach.

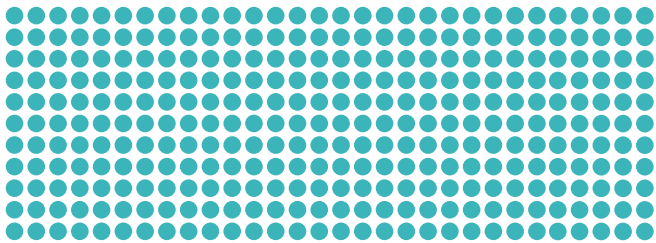
The Department of Housing and Community Development (HCD) have traditionally arrived at a number for pent-up demand or housing shortfall by comparing vacancy rates in owner-occupied and rental housing to healthy benchmarks (1.5% for owner-occupied\* and 5% for rental housing). The largest of the four regions, six SoCal Counties (covering Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties) is considered in the example below\*\*.

### EXISTING HOUSING: Six SoCal Counties

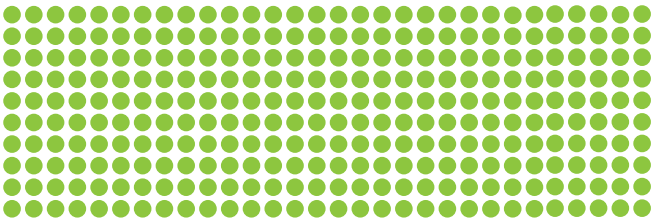
1 circle = 10,000 households

#### Occupied Housing Units

##### Home-owned (3.3 Million)



##### Rentals (3 Million)



#### Vacant Housing Units

Actual Vacancies (40,000)



1.2%

Healthy Benchmark (50,000)



1.5%

#### Existing Need

(10,000)



Actual Vacancies (111,000)



3.7%

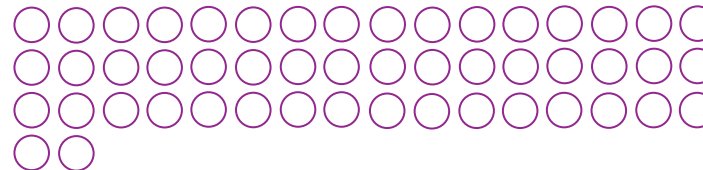
Healthy Benchmark (150,000)



5.0%

(39,000)

Seasonal Vacancies (500,000)\*\*\*



\* Owner-occupied has a lower healthy vacancy rate because it is usually only vacant while a house is for sale

\*\* All numbers are rounded to the nearest thousand.

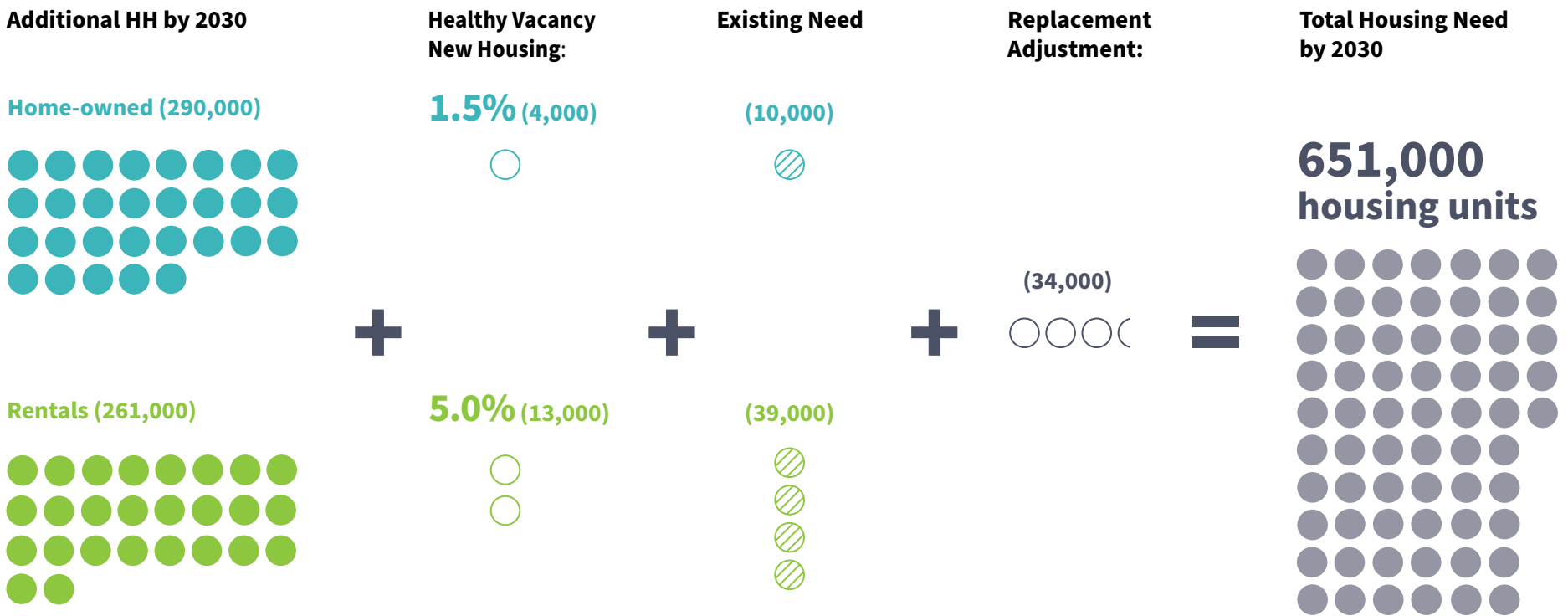
\*\*\* Seasonal Vacancies represent second homes, corporate housing, and short-term rentals such as AirBnBs

## The housing need also takes into account for future growth.

The Dept. of Finance (DOF) supplies the Dept. of Housing and Community Development (HCD) with an estimate of additional households (HH) needed by the end of the cycle. The DOF forecast the 2030 population and using an optimal household formation rate determine the number of households needed to comfortably house that population\*. The DOF also supply the HCD with the number of existing households at the start of the cycle. The HCD adds to the base number of additional households needed, factoring in vacancies for a healthy market, and adding a replacement adjustment (also supplied by the DOF)\*\*.

### PROJECTED HOUSING NEED: Six SoCal Counties

1 circle = 10,000 households



\* Households represent occupied housing units. The number of housing units is always higher as at any given time than the number of households because some housing will be vacant or unutilized. The DOF is responsible for the base projection because they manage population projections for the state, and determine those by analyzing births, deaths and net migration.

\*\* Replacement represents houses that may be demolished or replaced during the cycle\*.

**However, the Dept. of Housing and Community Development has adopted an unusual methodology in evaluating existing need in the 6th housing cycle.**

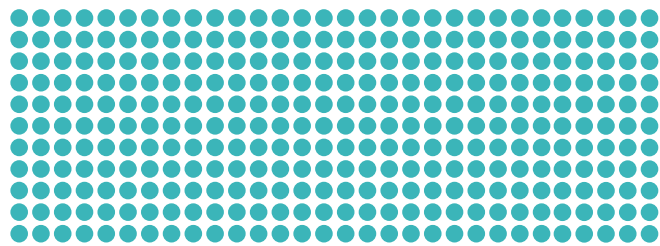
Instead of the typical 1.5% benchmark for owner-occupied housing, they used a 5% vacancy rate usually reserved for rental housing. A 5% vacancy in owner-occupied housing is indicative of a distressed housing market. At 5%, SoCal's existing housing need is increased by 115,000 housing units. Existing need for rental housing is unchanged.

**EXISTING HOUSING: Six SoCal Counties**

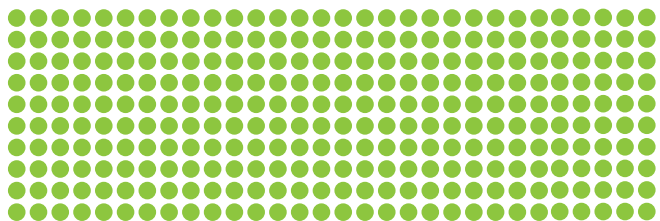
1 circle = 10,000 households

**Occupied Housing Units**

**Home-owned (3.3 Million)**



**Rentals (3 Million)**



**Vacant Housing Units**

**Actual Vacancies (40,000)**

**1.2%**



**Healthy Benchmark (165,000)**

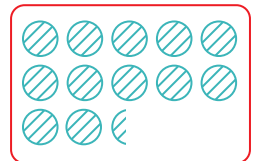
**5.0%**



**=**

**Existing Need**

**(125,000)**



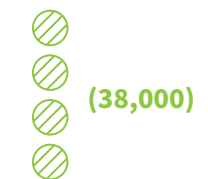
**Actual Vacancies (110,000)**

**3.7%**

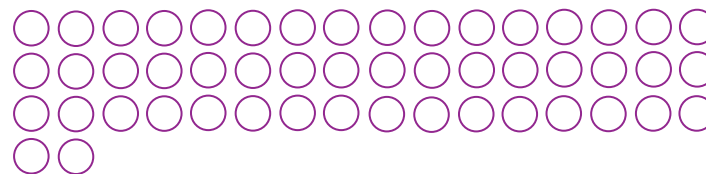


**Healthy Benchmark (149,000)**

**5.0%**



**Seasonal Vacancies (500,000)**

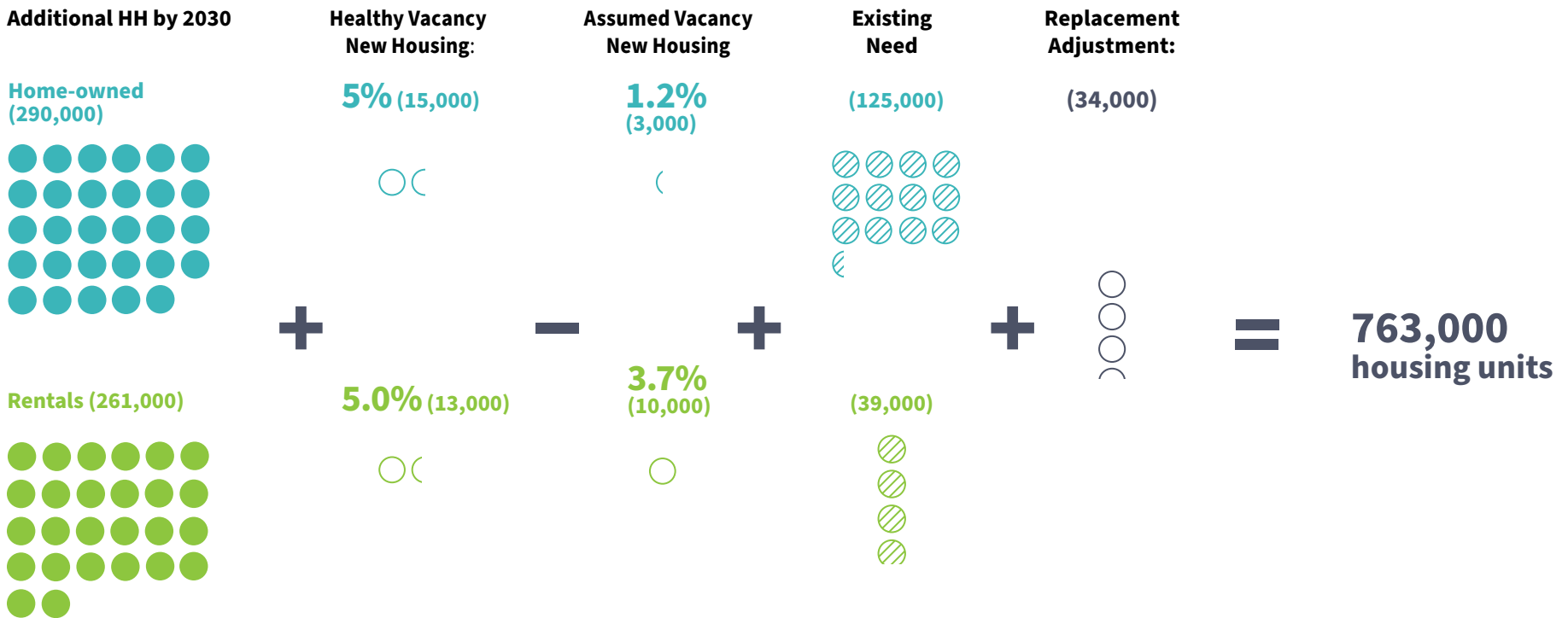


**The Dept. of Housing and Community Development have also taken an unusual approach in evaluating projected housing need.**

Again, instead of using the separate benchmark of 1.5% for owner-occupied housing, 5% was used for all housing. It was also assumed that new projected households had existing vacancies. The full benchmark was not applied to new households. Instead, the difference between the benchmark and the current vacancy rate was applied. The replacement adjustment was applied as it has been in the past.

**PROJECTED HOUSING NEED: Six SoCal Counties**

1 circle = 10,000 households



**Lastly, the Dept. of Housing and Community Development double counted by adding two new factors that had already been factored into household forecasts made by the Dept. of Finance (DOF).**

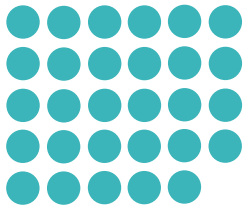
Two new factors were introduced into the 6th assessment – overcrowding and cost burdening. These factors had already been rolled into the DOF’s household projections. The DOF explicitly recognized that regional household formation rates might be depressed (a symptom of overcrowding and cost-burdening) because of the affordable housing crisis. The household formation rate used by the DOF is higher than the actual rate experienced. As such it generates a higher housing target meant to relieve overcrowding and cost-burdening.

**PROJECTED HOUSING NEED: Six SoCal Counties**

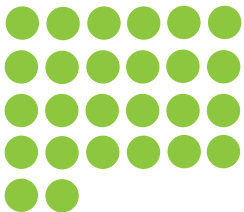
1 circle = 10,000 households

**Additional HH by 2030**

Home-owned  
(290,000)



Rentals (261,000)



**Projected Households already factors in overcrowding and cost-burdening**

From the Department of Finance

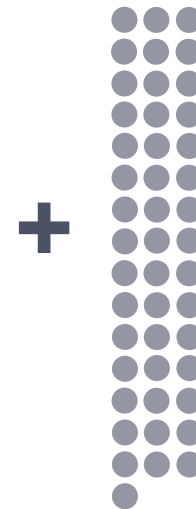
“The argument was that the Great Recession and the affordability crisis which impact recent trends in headship should not be allowed to solely dominate the projection, rather some return to underlying socio-cultural norms of homeownership/fewer roommates is a beneficial assumption”



**A DOUBLE COUNT**

Overcrowding Adjustment\*

(460,000)



Cost Burdening Adjustment\*\*

(118,000)



\* In addition to double counting, HCD incorrectly calculated the overcrowding factor. They assumed that for every house that was overcrowded another house would be required to relieve overcrowding. The more accurate analysis would be to assess the number of extra people to be housed and divide by the average household size.  
 \*\* HCD only applied cost-burdening adjustments to future households not existing households. It is unclear why cost-burdening would only be considered an issue for future households, as the data is for current households.

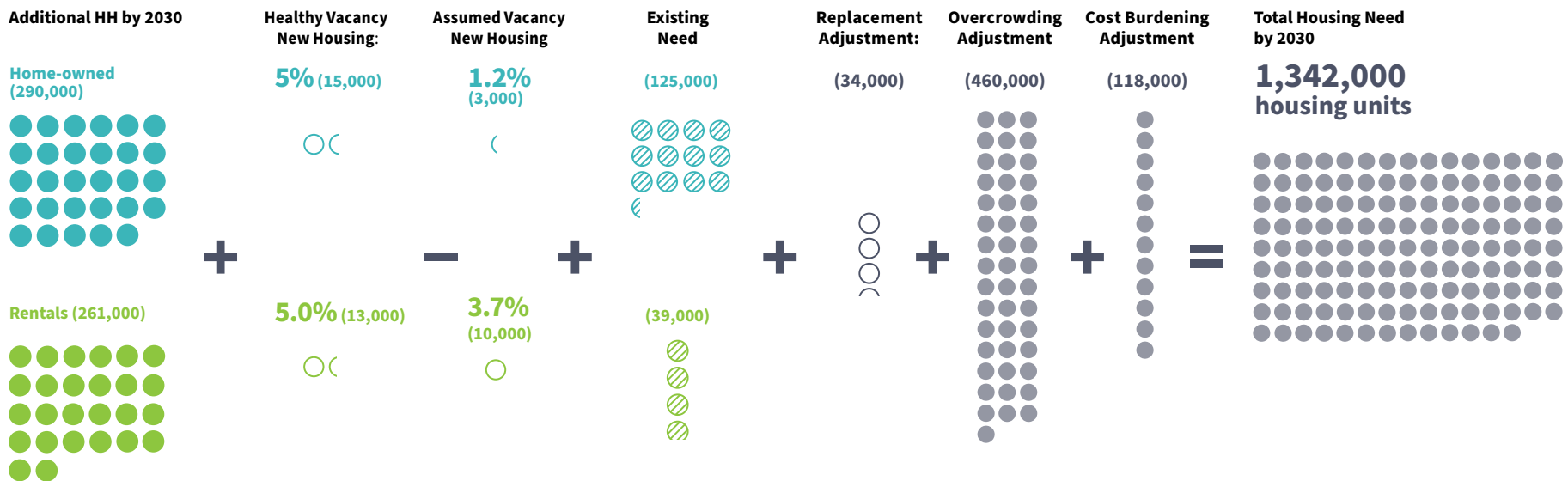
# The vacancy errors and double counting resulted in a doubling of the housing needs assessment for the six counties of SoCal.

## TYPICAL METHODOLOGY

1 circle = 10,000 households



## HCD 6TH CYCLE METHODOLOGY



Complete data tables: *RHNA Data and Models 6th cycle*, [www.embarcaderoinstitute.com](http://www.embarcaderoinstitute.com)

**References used in the analysis :**

**Dept. of Housing and Community Development (HCD)** <https://www.hcd.ca.gov>

**Regional Housing Needs Allocation and Housing Elements**

**Regional Housing Needs**

**Allocations for 6th Cycle Housing Elements:**

- Association of Bay Area Governments Regional Housing Need Determination Plan for the Sixth Housing Element Update
- Sacramento Area Council of Governments Regional Housing Need Determination for the Sixth Housing Element Update
- Southern California Association of Governments Regional Housing Need Determination for the Sixth Housing Element Update
- San Diego Association of Governments Regional Housing Need Determination and Plan for the Sixth Housing Element Update

**Allocations for 5th Cycle Housing Elements:**

- Association of Bay Area Governments (February 24, 2012)
- Sacramento Area Council of Governments (September 26, 2011)
- San Diego Association of Governments (November 23, 2010)
- Southern California Association of Governments (August 17, 2011)

**Annual Progress Reports**

Annual Progress Report APR: 5th Cycle Annual Progress Report Permit Summary (updated 7/30/2020)

**Allocations for Earlier Cycles and Housing Element**

- RHNA 2007-2014 - Housing Methodology Committee Agenda Packet 07-27-06
- Regional Housing Needs Plan 2006 to 2013 SACOG February 2008
- 3rd and 4th Cycle RHNA allocations (data sent in personal communication with the Department of Housing and Community Development)

**Department of Finance Methodology for Household Forecasts**

- "Read Me" P4 Tables : Household Projections 2020 to 2030
- Association of Bay Area Governemnets Digital Library: RHNA Documents, Regional Housing Need Allocation Documents
- RHNA 2007-2014 - Housing Methodology Committee Agenda Packet 07-27-06, Regional Housing Need Allocation p 2

**Other Housing Assessment Methodologies**

**"Mckinsey & Company:** A TOOL KIT TO CLOSE CALIFORNIA'S HOUSING GAP: 3.5 MILLION HOMES BY 2025", October 2016

**Jobs to Housing**

Employment Development Department, State of California, Employment Projections : Long Term Projections  
<https://www.labormarketinfo.edd.ca.gov/data/employment-projections.html>





FEBRUARY 2020

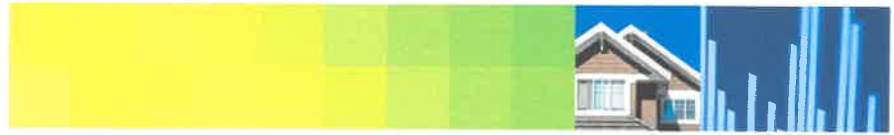
## The Housing Supply Shortage: State of the States

The United States suffers from a severe housing shortage. In a recent study, [The Major Challenge of Inadequate U.S. Housing Supply](#), we estimated that 2.5 million additional housing units will be needed to make up this shortage. Our earlier study used national statistics, treating the United States as a single market. What happens when we look closer, basing the analysis at the state level?

When we account for state-level variations, the estimated housing deficit is even greater in some states because housing is a fixed asset. A surplus of housing in one area can do little to help faraway places. For example, vacant homes in Ohio make little difference to the housing markets in Texas. We estimate that there are currently 29 states that have a housing deficit, and when we consider only these states, the housing shortage grows from 2.5 million units to 3.3 million units.

Unsurprisingly, the states with the most severe housing shortage are the states that have recently attempted to loosen zoning policy regulations. States like California, Oregon, and others have undertaken policy action to address this issue. California, for example, has been working on chipping away at single-use zoning while Texas has passed a density bonus program, an ordinance which amends the city code by loosening site restrictions and promoting construction of more units in affordable and mixed-income housing developments. Oregon was one of the first states to pass legislation to eliminate exclusive single-family zoning in much of the state. The Minneapolis City Council voted to get rid of single-family zoning and started allowing residential structures with up to three dwelling units in every neighborhood. We took a deep dive into the supply/demand dynamics to analyze state-level variations.

We estimate that there are currently 29 states that have a housing deficit, and when we consider only these states, the housing shortage grows from 2.5 million units to 3.3 million units.



### Accounting for housing supply/demand conditions

To estimate housing supply, we rely on U.S. Census Bureau estimates of the total number of housing units in each state. These estimates include single-family homes, apartments, and manufactured housing. We compare supply to our estimates of housing demand. We first focus on static estimates of housing demand, and then we consider the impact of interstate migration.

Our estimate of housing demand relies on two components. First, we need an estimate of long-term vacancy rates ( $v^*$ ). Second, we need an estimate of the target number of households ( $h^*$ ).<sup>1</sup> The estimates of  $v^*$  and  $h^*$  give an estimate of housing demand ( $k^*$ ) using the formula:

$$k^* = \frac{h^*}{1 - v^*} \text{ Eq(1)}$$

### Vacancy rates

As we discussed in our earlier [study](#), for the housing market to function smoothly, year-round vacant units are needed. Vacancy rates are often used to track the vitality of the housing market. Too high of a vacancy rate reflects a moribund market, while too low of a rate means demand is outstripping supply. Our previous research estimated the average U.S. vacancy rate to be around 13%.

For long-term vacancy rates ( $v^*$ ), we use historical estimates of vacancy rates in each state as well as the share of the state in the housing stock to obtain the state weight. We compute the weighted average national vacancy rate for the U.S. and then estimate the deviation of the state vacancy rate from the average national vacancy rate (see **Appendix 1.1** for a detailed methodology). We use each state's average from 1970 to 2000 as the estimate for  $v^*$  because this was the period before the boom and the bust in the housing market began. Historical vacancy rates vary dramatically by state. States like Vermont and Maine tend to have high vacancy rates because a large fraction of the housing stock serves as vacation/second homes. On the other hand, states like California tend to have very low vacancy rates.

<sup>1</sup> The target number of households is the number of unconstrained households that would have formed if households did not face any constraints related to housing costs.

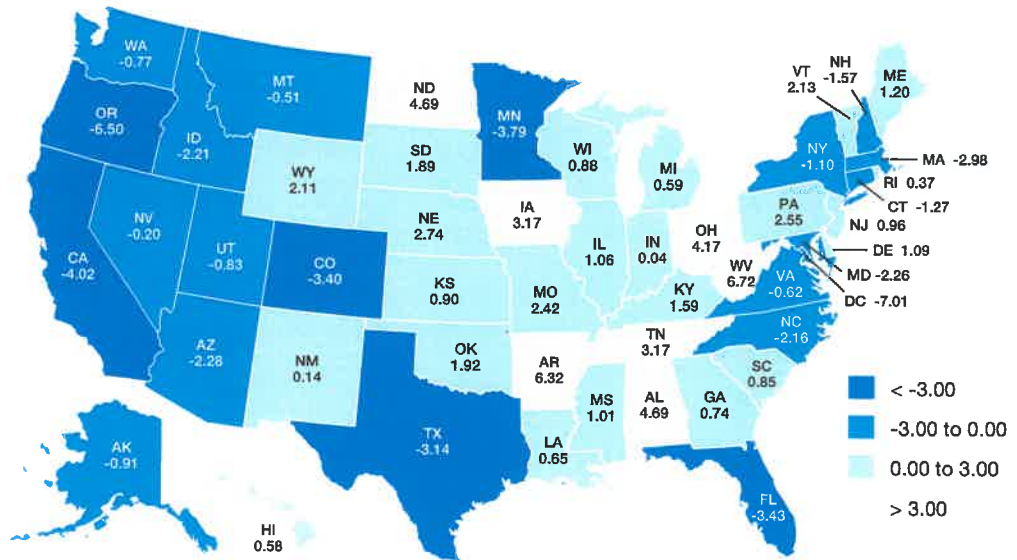


It is interesting to compare each state's long-term vacancy rate ( $v^*$ ) to recent estimates ( $v$ ). This measure estimates the number of housing units needed to close the gap between the current vacancy rate and long-term average rates. **Exhibit 1** shows the difference between the estimated vacancy rate in 2018 and the long-term vacancy rate for each state. States like Oregon, California, and Minnesota have much lower current vacancy rates compared to their historical averages, while states like West Virginia, Alabama, North Dakota, and Ohio have witnessed an increase in the vacancy rates as the populations of these states have decreased.

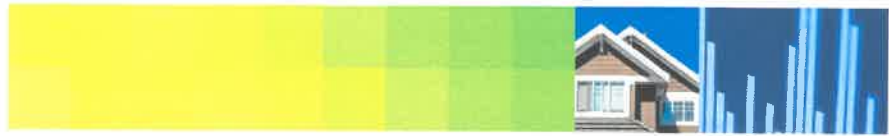
**Exhibit 1**

**Difference between 2018 vacancy rate and historical vacancy rate**

States that are losing (gaining) population have high (low) vacancy rates.



Source: Author's calculations based on CPS, HVS, and Moody's Analytics estimated data.



### Target households

Our previous [research](#) has shown that high housing costs have constrained household formation. These high housing costs have hit the Millennial generation particularly hard. To overcome these cost barriers, some young adults have turned to shared living arrangements. Others have moved back home with parents. As a result, there are more than 400,000 missing households headed by 25- to 34-year-olds (households that would have formed except for higher housing costs).

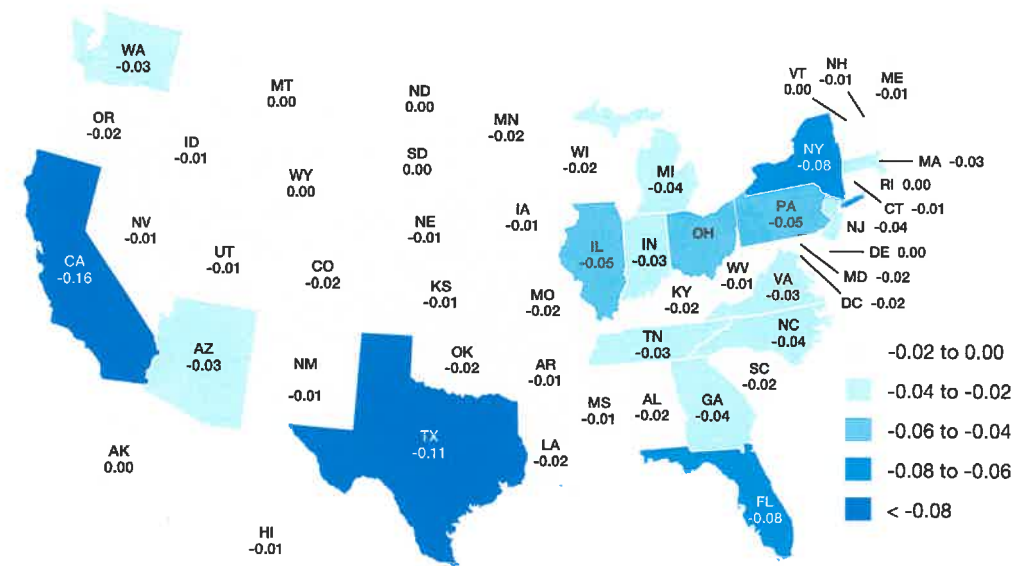
While high housing costs have hit young adults hardest, they have affected all age groups. If housing costs were lower, more households would form. We use our model estimates of the number of households reduced due to unusually high housing costs and add them back. We do this for each age group (see **Appendix 1.2** for more details.)

Due to different age profiles, the share of missing households varies by state. **Exhibit 2** plots the share of missing households due to housing costs for each state. In general, states with relatively lower vacancy rates have proportionally more missing households.

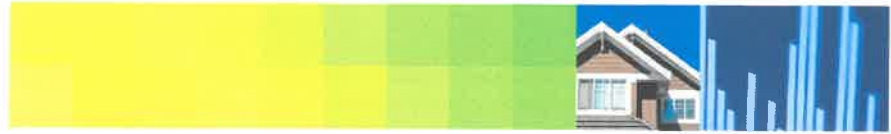
### Exhibit 2

#### Missing households due to high housing costs (millions)

States with relatively lower (higher) vacancy rates have proportionally more (fewer) missing households.



Source: Author's calculations based on American Community Survey data.



### Static estimate of housing deficit

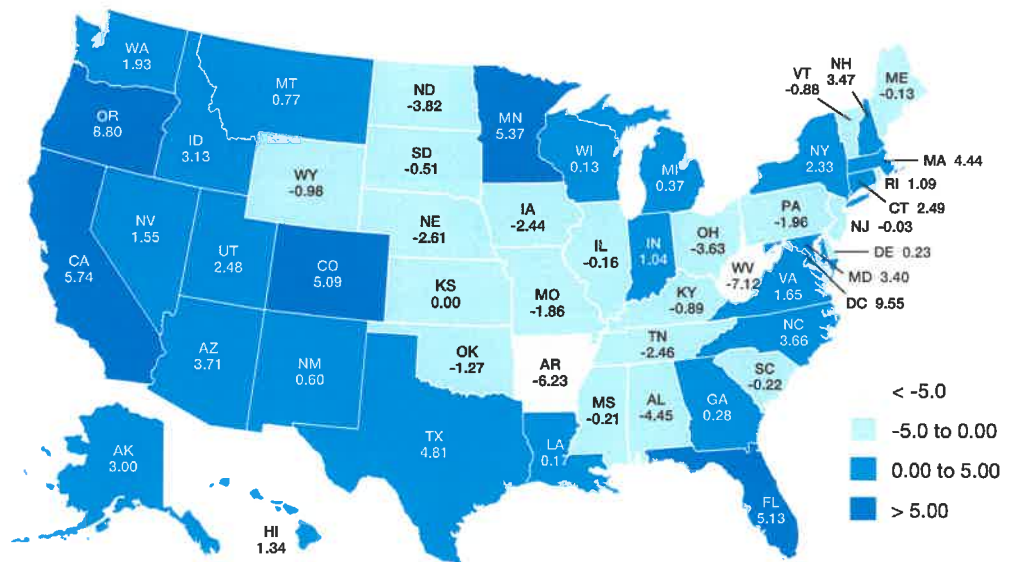
We combine our target vacancy rate and target households to estimate housing demand. Subtracting our estimated housing demand from the Census estimate of housing supply gives us the estimated housing deficit. **Exhibit 3** shows our results by state.

As a percent of the housing stock, the state housing supply deficit varies from -7 to 10%. Excluding the District of Columbia, Oregon has the largest deficit (nearly 9%) followed by California (nearly 6%).<sup>2</sup> Some states have a negative deficit, meaning they are oversupplied. According to our estimate, 21 states are oversupplied, the largest being West Virginia, at more than 7%.

### Exhibit 3

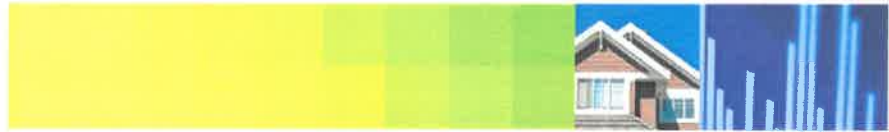
#### Housing stock deficit as proportion of a state's housing stock (static estimate not considering interstate migration flows)

A static view suggests that 29 states have a housing undersupply.



Source: Author's calculations.

<sup>2</sup> The District of Columbia had the highest deficit as a share of the existing housing stock at 9.7%.



### Impact of migration on the housing deficit of the states

While houses stay in place, people do not. Job growth attracts in-migrants, while a dearth of opportunity drives out-migration. High housing costs also contribute to migration patterns. When the rents get too high, people move away. This dynamic can impact our estimates.

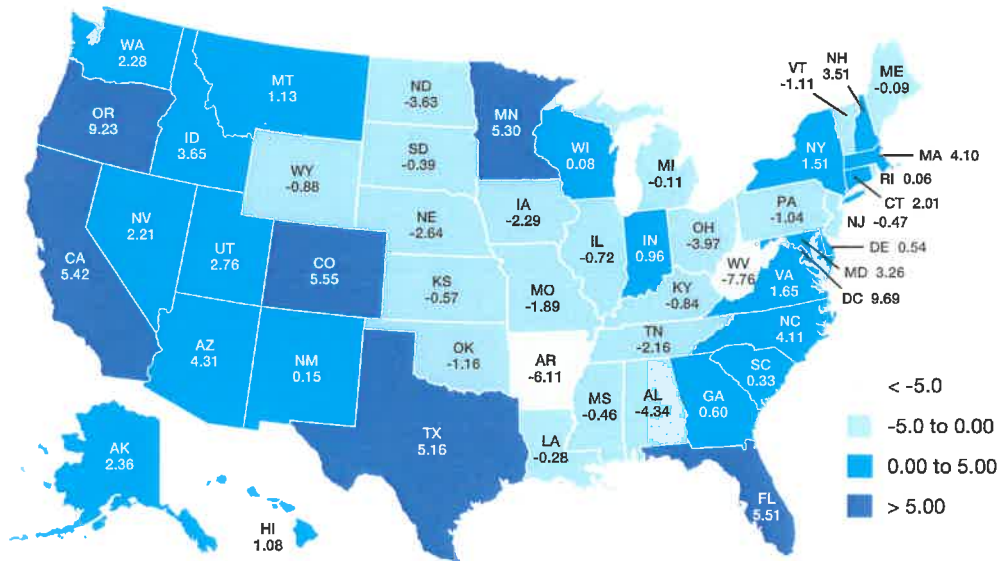
It's helpful to consider the case of California. Our estimates indicate that California has a shortage of 820,000 housing units. But history suggests that California's shortage may be overestimated if interstate migration is considered. For more than four decades, California's state population has grown, but this increase has been driven primarily by international migration. High housing costs have driven many U.S. citizens and households out of California, driving housing demand higher in their destination states.

A robust model of domestic migration flows between states is beyond the scope of this study. But we can approximate how migration may affect our estimates. We can use the historical average of state-to-state migration flows as a forecast of future flows. If the future interstate migration exactly matches past flows since 2001, we can create a rough, but useful approximation (Exhibit 4).<sup>3</sup>

#### Exhibit 4

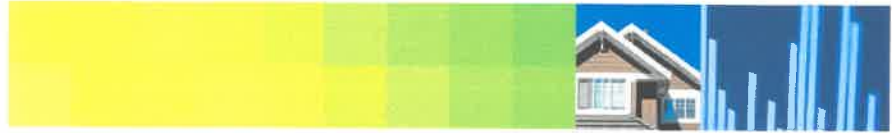
### Housing stock deficit as proportion of state's housing stock (dynamic estimate considering interstate migration flows)

A dynamic view indicates that some states' deficit is overestimated, like California, while others' is underestimated, like Texas. Some states, like Michigan, move from a deficit to a surplus.



Source: Author's calculations.

<sup>3</sup> We used the average net migration flows between states from 2001 to 2017 for the past flows.



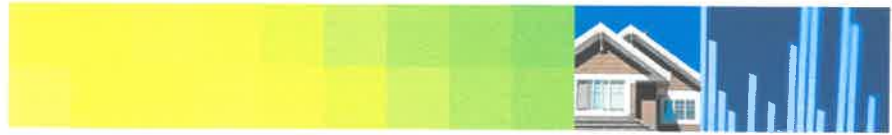
For example, when considering migration flows, the estimated housing demand in Michigan changes from deficit to surplus; Ohio's surplus increases; and Florida's deficit increases (see **Appendix 1.3** for details on our estimation method).

Given the severity of the problem, states have started addressing the issue of supply shortages by taking legislative action. Some of these states such as California, Oregon, Minnesota, and North Carolina have passed legislation to eliminate exclusive single-family zoning. Removing these zoning restrictions will provide builders with the flexibility to build a range of housing options which could help alleviate some of the shortage.

### Conclusion

A shortage of housing remains a major issue for the United States. Years of underbuilding has created a large deficit, particularly for states with strong economies that have attracted a lot of people from other states. The issue of undersupply will be further exacerbated as Millennials and younger generations enter the housing markets, especially as housing costs become more favorable.

Dynamic estimates suggest that contrary to expectations, it isn't only the larger states that have a higher housing supply shortage. Some of the smaller states, which have been attracting a lot of migrants from other states, also need to build more housing units to accommodate the needs of their growing population.



## Appendix

### 1.1 Vacancy rate calculations

We calculate the vacancy rate based on the historical vacancy rate. For this purpose, we obtain the historical vacancy rates by state from Moody's analytics for the period from 1970 to 2000<sup>4</sup> and estimate the average vacancy rate for this period for each state.

$$VR_i = average(VR_i) \text{ for } 1970-2000,$$

where  $i$  is the state.

We then obtain the housing stock information by state from the Housing Stock (HVS) ('000s) U.S. Census Bureau (BOC): Housing Vacancies and Homeownership—Table 8—Quarterly Estimates of the Housing Inventory. From these data, the share of the state in the total housing stock is calculated to get the state weights.

$$w_i = \frac{K_i}{\sum_i K_i}.$$

The sum product of the vacancy rate of the state and the state's weight in the housing stock gives us the U.S. average vacancy rate.

$$\text{U.S. average vacancy rate: } VR = \sum_i VR_i * w_i.$$

We then compute the difference between the state vacancy rate and the average U.S. vacancy rate to see how far away the state is from the U.S. average.

$$D_i = VR_i - VR.$$

This deviation for the states is then applied to the long-run vacancy rate for the United States (which we estimated earlier to be 13%) to get the state-wise vacancy rate.

$$\text{State-wise Vacancy Rate} = 13\% + D_i \text{ for each state.}$$

### 1.2 Estimating target households

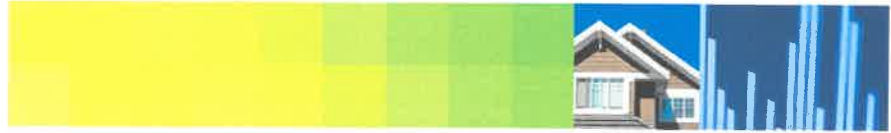
We obtain the headship rates<sup>5</sup> for the year 2018 by state and by age for all the 50 states and District of Columbia.<sup>6</sup> We then estimate target households using this headship rate and adding back housing

4 Data is available from 1970:Q2 onward. We estimate the average for the period up to 2000:Q4. This corresponds to the period before the boom and bust in the housing market began.

5 Headship Rate = Number of Head of Households/Total Households.

6 Data source: Current Population Survey—Annual Social and Economic Supplement (CPS-ASEC) using the Integrated Public Use Microdata Series (IPUMS) (Steven Ruggles, Sarah Flood, Ronald Goeken, Josiah Grover, Erin Meyer, Jose Pacas and Matthew Sobek. IPUMS USA: Version 9.0 [dataset]. Minneapolis, MN: IPUMS, 2019.)





costs assuming that housing costs become more favorable for household formation. The target headship rate would be

$$hr_{i,j}^* = hr_{(i,2018)} + \alpha_{(\text{housing costs}, i)}$$

We then use this target headship rate and the population by five-year age buckets to compute the households in each state.

$$hh_i^* = \sum_j hr_{i,j}^* * pop_{i,j}$$

where  $i$  is the state and  $j$  is the five-year age buckets.

The product of headship rate and population by age gives the households by age group. Summing it up over all the ages gives the total households in the state.<sup>7</sup>

### 1.3 Domestic migration flows between states

For the estimate of the states' share of the deficit, we need to obtain the share of the migration flows between states by age. To get detailed age-wise distribution of population, we use the ACS data from 2001 to 2017. We obtain the population by age and by state for these years. We identify people who had a different state of residence from a year ago, which indicates that they migrated to a different state. We then get estimates of the in-migrants and out-migrants by state and age.

We then estimate the net domestic migrants for each state as the difference between the in-migrants and out-migrants.

$$NM_{i,j} = I_{i,j} - O_{i,j}$$

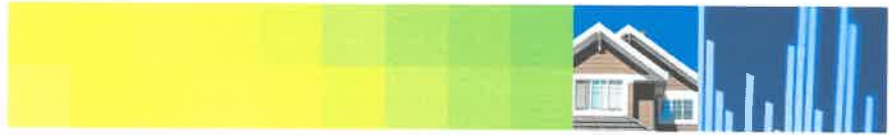
where  $i$  is the state,  $j$  is the five-year age buckets,  $I$  is the in-migrants, and  $O$  is the outmigrants.

To estimate the net outmigrants from states that have a  $NM < 0$ , we obtain the Moody's historical net domestic migration data. We then apply these shares by state and age to the net migration data for 2018 to obtain the number of people leaving a state by the five-year age bucket.

$$\Delta P_{i,j,out}^* = \frac{NM_{i,j}}{\sum_{i,j} NM_{i,j}} * P_{m,j}$$

where  $P_{i,j,out}^*$  is the total change in population (net out-migrants) for states that have net outmigration,

<sup>7</sup> These households would be based on the Current Population survey (CPS). To make them consistent with estimates of housing supply from HVS, we apply a multiplier to this gap that is proportional to the gap between the CPS-ASEC and HVS household counts. The CPS-ASEC household estimate for 2018 was 127.6 million. The HVS estimate for that year was 121.3 million. We deflate our target households by a factor equal to 121.3/127.6, or 0.95.



$NM_{i,j}$  is the net out-migrants by age group and state,

$\sum NM_{i,j}$  is the sum of the total out-migrants for the state, and

$P_{m,j}$  is the historical net domestic migration data from Moody.

The ratio of  $NM / \sum NM$  gives the share of the five-year age group in the total out-migrants from the state.

This pool of out-migrants ( $P_{i,j,out}^*$ ) is then divided among the in-migrating states, given that the net flows for the country are 0.

We distribute these migrants according to the share of the state in the total in-migrants as well as by the share of the age group in the total in-migrants to the state.

$$\Delta P_{i,j,in}^* = SI_i * SA_{i,j} * \Delta P_{i,j,out}^*$$

where  $\Delta P_{i,j,in}^*$  is the in-migrants to the state i from the outmigrants pool,

$SI$  is the share of the state in total in-migrants,

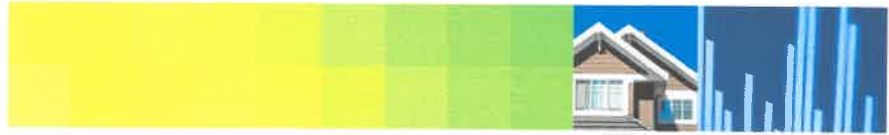
$SA$  is the share of the five-year age bucket in the total in-migrants, and

$\Delta P_{i,j,out}^*$  is the total out-migrants.

The population of each state is then adjusted according to the change in the population estimated above.

$$\begin{aligned} Population_i^* &= P_{i,j} + \Delta P_{i,j,out}^* \text{ if } NM < 0. \\ &= P_{i,j} + \Delta P_{i,j,in}^* \text{ if } NM > 0. \end{aligned}$$

The households are then computed based on this adjusted population for each state by applying the headship rates by age group. Then the housing stock is estimated as per equation (1).



## Economic & Housing Research **Insight**

### Prepared by the Economic & Housing Research group

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Len Kiefer, Deputy Chief Economist

Venkataramana Yanamandra, Macro Housing Economics Senior

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**Data Input and Verification Form**  
**Bottom-Up Local Input and Envisioning Process**  
**2020 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS)**

Date: 09/29/18

Page 1

A - Contact & Background Information

**This Represents Communication:** From the Jurisdiction of Downey to SCAG

|  |   |
|--|---|
| <p><b>Jurisdiction Contact Person:</b> <u>David Blumenthal</u></p> <p><b>Position:</b> <u>City Planner</u></p> <p><b>Email:</b> <u>dblumenthal@downeyca.org</u></p> <p><b>Phone:</b> <u>(562) 904-7154</u></p>   | <p><b>Background Information:</b></p> <p><input checked="" type="checkbox"/> I am my Jurisdiction's City Manager/County Administrative Officer, Community Development/Planning Director, or City Clerk (submitting on behalf of a jurisdiction's governing body)</p> <p><input type="checkbox"/> I am a staff person from a local Jurisdiction, submitting input under supervision of one of the persons identified above (see appropriate signature below)</p> |
| <p><b>Additional Background, if any, based upon Previous Communications:</b> The City of Downey is also transmitting a document summarizing and providing detailed comments/edits to the SCAG socioeconomic data/growth projections and data/map book and edits to GIS data via dropbox.</p> |   |

B - Action Items

**We are seeking to (select all that apply):**

**Submit to SCAG:**

Provide Input on SCAG's Core Geographic Data  Other, please specify \_\_\_\_\_

Provide Input on SCAG's Core Demographic Data

Provide Input on Supplemental Data Elements

C - Data Type

**With Relation to SCAG's:**

|  |   |  |  |
|--|---|--|--|
| <p><b>Core Geographic Data:</b></p> <p><input checked="" type="checkbox"/> General Plan Land Use</p> <p><input checked="" type="checkbox"/> Zoning</p> <p><input checked="" type="checkbox"/> Existing Land Use</p> <p><input checked="" type="checkbox"/> Specific Plan Land Use</p> <p><input type="checkbox"/> Endangered Species and Plants*</p> <p><input type="checkbox"/> Open Space and Parks*</p> <p><input type="checkbox"/> Flood Areas*</p> <p><input type="checkbox"/> Natural Community and Habitat Conservation Plans*</p> <p><input checked="" type="checkbox"/> Farmland*</p> <p><input checked="" type="checkbox"/> Coastal Inundation (Sea Level Rise)*</p> <p><input type="checkbox"/> Major Stops and High Quality Transit Corridors*</p> <p><input checked="" type="checkbox"/> Transit Priority Areas*</p> <p><input checked="" type="checkbox"/> Regional Bikeways</p> <p><input checked="" type="checkbox"/> Regional Truck Routes</p> <p><input type="checkbox"/> City Boundary*</p> <p><input checked="" type="checkbox"/> Sphere of Influence*</p> <p><input type="checkbox"/> Census Tracts**</p> <p><input type="checkbox"/> Transportation Analysis Zone (TAZ) Boundaries**</p> <p><input checked="" type="checkbox"/> Entitlements</p> <p><input checked="" type="checkbox"/> Potential Infill Sites</p> | <p><b>Core Demographic Data:</b></p> <p><input checked="" type="checkbox"/> Population</p> <p><input checked="" type="checkbox"/> Households</p> <p><input checked="" type="checkbox"/> Employment</p> <p><b>Year:</b></p> <p><input checked="" type="checkbox"/> 2016</p> <p><input checked="" type="checkbox"/> 2020</p> <p><input checked="" type="checkbox"/> 2030 (Input needed at jurisdictional level only)</p> <p><input checked="" type="checkbox"/> 2035</p> <p><input checked="" type="checkbox"/> 2045</p> <p><b>Geographic Level:</b></p> <p><input checked="" type="checkbox"/> Jurisdictional Level</p> <p><input checked="" type="checkbox"/> Transportation Analysis Zone (TAZ)</p> <p><input type="checkbox"/> Other Geographic Level (Please Specify): _____</p> |  |  |
| <p><b>Supplemental Data Elements (available for review June 2018):</b></p> <table style="width: 100%; border: none;"> <tr> <td style="border: none; width: 50%; vertical-align: top;"> <p><input type="checkbox"/> Zoning Overlay Areas</p> <p><input type="checkbox"/> Community Design Overlays</p> <p><input type="checkbox"/> Community Land Trusts</p> <p><input type="checkbox"/> Historic Preservation Areas</p> <p><input type="checkbox"/> Bike Sharing Facilities</p> <p><input type="checkbox"/> Bike Stations</p> <p><input type="checkbox"/> Car-Sharing Parking Sites</p> <p><input type="checkbox"/> Joint Public/Private Developments for Affordable Housing</p> <p><input type="checkbox"/> Areas with Reduced Parking Minimums and Maximums</p> </td> <td style="border: none; width: 50%; vertical-align: top;"> <p><input type="checkbox"/> Corridor Plans</p> <p><input type="checkbox"/> Special Districts</p> <p><input type="checkbox"/> Bike/Ped Volume Data***</p> <p><input type="checkbox"/> Ped Trails/Sidewalk Data***</p> <p><input type="checkbox"/> Public Health Data***</p> </td> </tr> </table>  |   | <p><input type="checkbox"/> Zoning Overlay Areas</p> <p><input type="checkbox"/> Community Design Overlays</p> <p><input type="checkbox"/> Community Land Trusts</p> <p><input type="checkbox"/> Historic Preservation Areas</p> <p><input type="checkbox"/> Bike Sharing Facilities</p> <p><input type="checkbox"/> Bike Stations</p> <p><input type="checkbox"/> Car-Sharing Parking Sites</p> <p><input type="checkbox"/> Joint Public/Private Developments for Affordable Housing</p> <p><input type="checkbox"/> Areas with Reduced Parking Minimums and Maximums</p> | <p><input type="checkbox"/> Corridor Plans</p> <p><input type="checkbox"/> Special Districts</p> <p><input type="checkbox"/> Bike/Ped Volume Data***</p> <p><input type="checkbox"/> Ped Trails/Sidewalk Data***</p> <p><input type="checkbox"/> Public Health Data***</p> |
| <p><input type="checkbox"/> Zoning Overlay Areas</p> <p><input type="checkbox"/> Community Design Overlays</p> <p><input type="checkbox"/> Community Land Trusts</p> <p><input type="checkbox"/> Historic Preservation Areas</p> <p><input type="checkbox"/> Bike Sharing Facilities</p> <p><input type="checkbox"/> Bike Stations</p> <p><input type="checkbox"/> Car-Sharing Parking Sites</p> <p><input type="checkbox"/> Joint Public/Private Developments for Affordable Housing</p> <p><input type="checkbox"/> Areas with Reduced Parking Minimums and Maximums</p>   | <p><input type="checkbox"/> Corridor Plans</p> <p><input type="checkbox"/> Special Districts</p> <p><input type="checkbox"/> Bike/Ped Volume Data***</p> <p><input type="checkbox"/> Ped Trails/Sidewalk Data***</p> <p><input type="checkbox"/> Public Health Data***</p>  |  |  |

\* These data elements are maintained by local, state, or federal entities, and SCAG will forward input received from jurisdictions to the appropriate source

\*\* These data elements are being provided as reference information as they are not open to revision (TAZ Boundaries and Census Tracts)

\*\*\* For these elements, SCAG is looking to obtain any available data; local review not needed

Attachment: Data Input and Verification Form (City of Downey) (Appeal of the Draft RHNA Allocation for the City of Downey)

**Input on SCAG's Core Geographic Data (select all that apply):**

- We have reviewed the selected Core Geographic Data and verify their accuracy
- We cannot verify the accuracy of certain data items at this time and would like to suggest the revisions described above

X \_\_\_\_\_  
 Signature (to be executed by City Manager/County Administrative Officer, Community Development/Planning Director, or City Clerk (on behalf of a jurisdiction's governing body))



**Input on SCAG's Core Demographic Data (select all that apply):**

- We have reviewed SCAG's Jurisdictional Level Demographic Data and can provide official approval
- We have reviewed SCAG's Tier 2 TAZ Demographic Data and can provide official approval
- We cannot provide official approval at this time, and would like to suggest revisions to the Jurisdictional-level figures listed below with the following considerations (please select a reason and provide comments below. Optionally, documentation can also be submitted to SCAG)

- Infrastructure Capacity (e.g. sewer or water capacity)
- Available Land Capacity
- Special Housing Needs (e.g. farmworkers, student dormitories, etc.)
- Market Conditions (e.g. high number of residential vacancies)
- Historical Trends (e.g. Census and/or historical data)
- Economic Constraints (e.g. retail center closure)
- Other Factors (please specify)\*\*\*\* SEE ATTACHED DETAILED SUMMARY -  
Inaccurate baseline and projected estimates.

|            | 2016    | 2020    | 2030    | 2036    | 2046    |
|------------|---------|---------|---------|---------|---------|
| Population | 113,267 | 113,998 | 115,939 | 117,004 | 119,207 |
| Households | 32,846  | 32,840  | 33,327  | 33,574  | 34,072  |
| Employment | 42,850  | 43,315  | 44,151  | 44,573  | 45,822  |

- We cannot provide official approval at this time, and would like to suggest revisions to the TAZ-level figures with the following considerations (please submit TAZ-level figures as an attachment to this form, select a reason, and provide comments below. Optionally, documentation can also be submitted to SCAG)

- Infrastructure Capacity (e.g. sewer or water capacity)
- Available Land Capacity
- Special Housing Needs (e.g. farmworkers, student dormitories)
- Market Conditions (e.g. high number of residential vacancies)
- Historical Trends (e.g. Census and/or historical data)
- Economic Constraints (e.g. retail center closure)
- Other Factors (please specify)\*\*\*\* SEE ATTACHED DETAILED SUMMARY -  
Inaccurate baseline and projected estimates, TAZ with excessive employment growth

X \_\_\_\_\_  
 Signature (to be executed by City Manager/County Administrative Officer, Community Development/Planning Director, or City Clerk (on behalf of a jurisdiction's governing body))



\*\*\*\* Per State housing law, jurisdictions cannot use any ordinance, policy, voter-approved measure, or standard to justify a determination or reduction in share of regional housing need

**Input on SCAG's Supplemental Data Elements (select all that apply):**

- We have reviewed the selected Supplemental Data Elements and verify their accuracy
- We cannot verify the accuracy of the data at this time and would like to suggest the revisions described above
- We would like to submit supplemental data items for SCAG's database

X \_\_\_\_\_  
 Signature (to be executed by City Manager/County Administrative Officer, Community Development/Planning Director, or City Clerk (on behalf of a jurisdiction's governing body))

**Comments (if applicable):**

The City of Downey is transmitting the following items as part of the Bottom-Up Local Input and Envisioning Process for the 2020 RTP/SCS/RHNA:

1. SCAG Local Input Survey
2. A document detailing the City's revisions to the SCAG socioeconomic data and growth projections and the 2020 RTP/SCS/RHNA Data/Map book
3. GIS data revisions (in a geodatabase format) for the following layers:  
 • General Plan • Zoning • Specific Plan Land Use • Existing Land Use • Open Space and Parks • Major Stops and High Quality Transit Corridors • Regional Bikeways • Regional Truck Routes • City Boundary • Infill Parcels

The items were submitted for the City via dropbox (<https://www.dropbox.com/request/U5sxUR6UQ4jSi5Gly85y>) by Diana Gonzalez per Tom Vo's (SCAG) instructions.

**Input was Submitted to SCAG via (select all that apply):**

- SCAG's Scenario Planning Model - Data Management Site
- Email to SCAG's RTPLocalInput@scag.ca.gov
- In person communication with SCAG staff
- Hard copies that have been mailed to SCAG's offices
- Other, please specify <https://www.dropbox.com/request/U5sxUR6UQ4jSi5Gly85y>

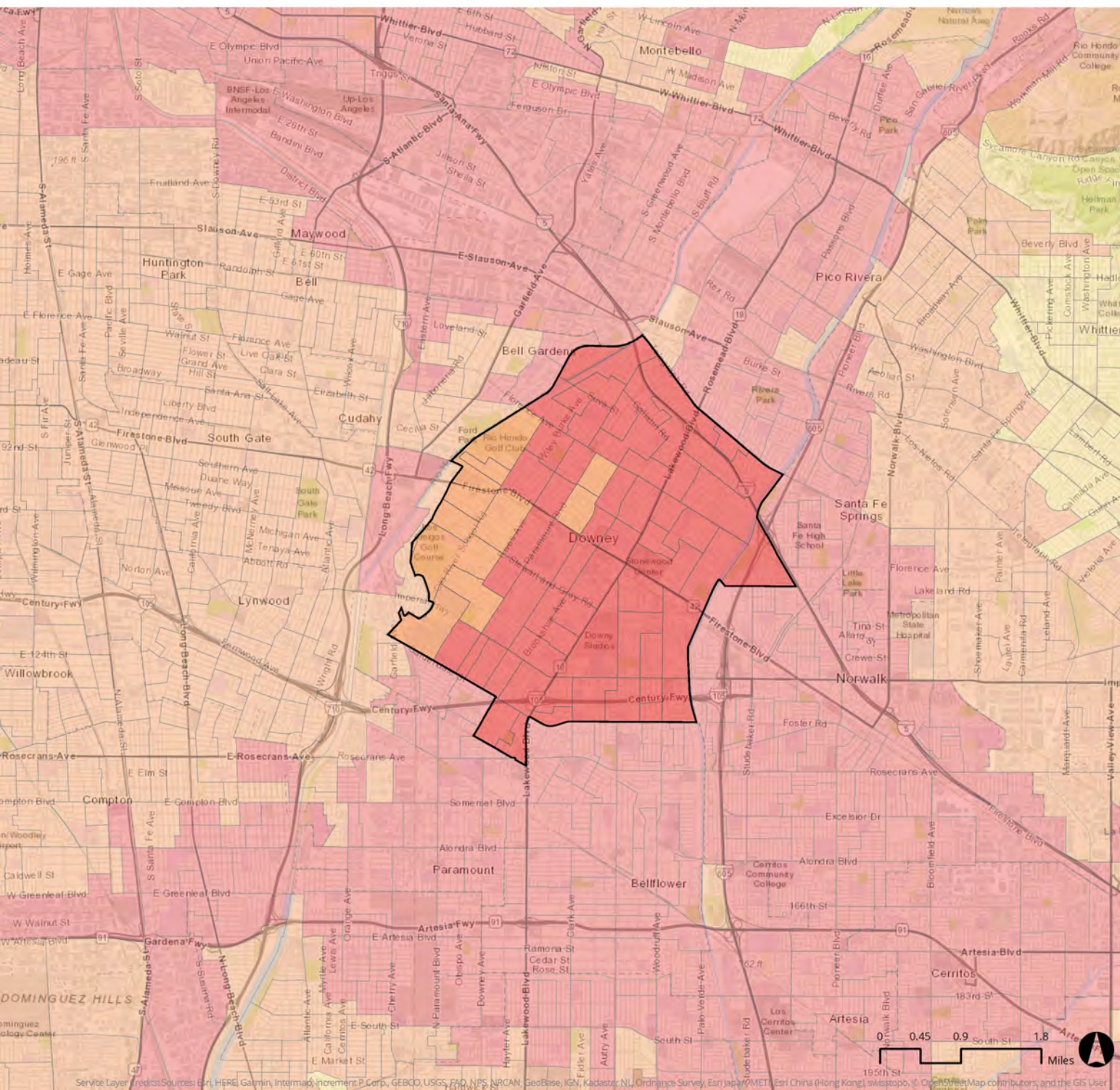
X \_\_\_\_\_  
 Signature (to be executed by City Manager/County Administrative Officer, Community Development/Planning Director, or City Clerk (on behalf of a jurisdiction's governing body))



D - Description of Action Items

E - Method of Submission

Attachment: Data Input and Verification Form (City of Downey) (Appeal of the Draft RHNA Allocation for the City of Downey)



## TAZ-level job accessibility in and around: City of Downey [Year 2045]

0% - 2.3%    2.4% - 7.8%    7.9% - 11.7%    11.8% - 15.5%    15.6% - 19.6%    19.7% - 32.3%

Note: These data represent the share of jobs in the SCAG region accessible by automobile commute in 30 minutes in 2045 during the peak AM commute (6-9am). Further detail on the job accessibility measure can be found in SCAG's Final RHNA Methodology. Note that since the SCAG region's total employment forecast for 2045 is 10,049,000 jobs, the number of jobs available can be measured by multiplying the percentage found on the map by this number. For example, a TAZ-level job accessibility measure of 10.0% means that 1,049,000 future jobs could be reached in 30 minutes.

Data Source: SCAG, 2020 | Map Created: 10/22/2020

Disclaimer: The data underlying the information shown on this map reflect jurisdiction's input submitted during the Local Input and Envision Connect SoCal. SCAG shall not be responsible for user's misuse or misrepresentation of this map. For the details regarding the sources, methodology of this map, please refer to the SCAG Data/Map Book at <https://www.connectsocial.org/Pages/Local-Input-Process.aspx> or contact [RTPLocalInfo@scag.org](mailto:RTPLocalInfo@scag.org)

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Ave  
Sacramento, CA 95833-1829  
916) 263-2911 FAX: (916) 263-7453  
www.hcd.ca.gov



December 10, 2020

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

Dear Executive Director Ajise:

**RE: Comment on Appeals of the Draft Regional Housing Need Allocation (RHNA) Plan**

Thank you for the opportunity to comment on the 52 appeals Southern California Association of Governments (SCAG) has received regarding the draft RHNA plan. The appeal process is an important phase in the development of a RHNA plan that ensures that all relevant factors and circumstances are considered.

The only circumstances under which a jurisdiction can appeal are:

- 65584.05(b)(1): The council of governments failed to adequately consider the information regarding the factors listed in subdivision (e) of section 65584.04.
- 65584.05(b)(2): The council of governments failed to determine the share of the regional housing need in a manner that furthers the intent of the objectives listed in subdivision (d) of section 65584.
- 65584.05(b)(3): A significant unforeseen change in circumstances occurred in the local jurisdiction that merits a revision of the information submitted pursuant to subdivision (e) of Section 65584.04.

The California Department of Housing and Community Development (HCD) urges SCAG to only consider appeals that meet these criteria.

Per Government Code section 65584.05(e)(1), SCAG's final determination on whether to accept, reject, or modify any appeal must be accompanied by written findings, including how the final determination is based upon the adopted RHNA allocation methodology, and how any revisions are necessary to further the statutory objectives of RHNA described in Government Code section 65584(d).

Among the appeals based on Government Code section 65584.05(b)(1), several appeals state that SCAG failed to consider the factor described in Government Code section 65584.04(e)(2)(B), citing the lack of land suitable for development as a basis for the appeal. However, this section states the council of governments may not limit its consideration of suitable housing sites to existing zoning and land use restrictions and must consider the potential for increased development under alternative zoning and

land use restrictions. Any comparable data or documentation supporting this appeal should contain an analysis of not only land suitable for urban development, but land for conversion to residential use, the availability of underutilized land, and opportunity for infill development and increased residential densities. In simple terms, this means housing planning cannot be limited to vacant land, and even communities that view themselves as built out must plan for housing through means such as rezoning commercial areas as mixed-use areas and upzoning non-vacant land.

With regard to appeals submitted related to Government Code section 65584.05(b)(2), that SCAG failed to determine the RHNA in a manner that furthers the statutory objectives, it should be noted that HCD reviewed SCAG's draft allocation methodology and found that the draft RHNA allocation methodology furthered the statutory objectives described in Government Code section 65584.

Among the appeals based on Government Code section 65584.05(b)(2), several contend that the cap on units allocated to extremely disadvantaged communities (DACs) does not further RHNA's statutory objectives. This cap furthers the statutory objective to affirmatively further fair housing by allocating more units to high opportunity areas and fewer units to low resource communities, and concentrated areas of poverty with high levels of segregation. Due to the inclusion of this factor, as well as the use of TCAC/HCD Opportunity Maps, SCAG's methodology allocates 14 of the top 15 highest shares of lower-income RHNA to jurisdictions with over 99.95 percent High and Highest Resource areas. With the exceptions of two jurisdictions, the 31 jurisdictions with the highest share of lower-income RHNA are all over 95 percent High and Highest Resource areas. Any weakening of these inputs to the methodology could risk not fulfilling the statutory objective to affirmatively further fair housing.

Several appeals argue that SCAG's RHNA allocation methodology does not adequately promote access to jobs and transit, as required in objectives two and three. HCD's review of SCAG's RHNA methodology found the allocation does further the environmental principles of objective two. SCAG's overall allocation includes significant weight related to the location of high-quality transit areas and the regional distribution of jobs that can be accessed within a 30-minute driving commutes. Regarding objective three, HCD's analysis as to whether jobs-housing fit was furthered by SCAG's draft methodology found that across all jurisdictions there is generally good alignment between low-wage jobs and lower-income RHNA, with all but 15 jurisdictions within a half percent plus or minus difference between their share of lower-income RHNA for the region and their percentage low-wage jobs for the region.

Several appeals are based upon the provision described in Government Code section 65584.05(b)(3), arguing that the COVID-19 pandemic represents a significant and unforeseen change in circumstances that will affect future population and job growth. Ensuring everyone has a home is critical to public health. Reducing and preventing overcrowding and homelessness are essential concerns for every community. The COVID-19 pandemic has only increased the importance that each community is planning for sufficient affordable housing.



Lastly, several appeals state that the Regional Housing Needs Determination (RHND) HCD provided to the SCAG region is too large. SCAG submitted an objection to the RHND at the appropriate time and through the appropriate process. HCD considered those objections and [determined the final RHND for 6<sup>th</sup> Housing Element Cycle for the SCAG region on October 15, 2019](#). There are no further appeal procedures available to alter the SCAG region's RHND for this cycle. Government Code section 65584.05(b) does not allow local governments to appeal the RHND during the 45-day period following receipt of the draft allocation.

HCD acknowledges that many local governments will need to plan for more housing than in the prior cycle to accommodate a RHND that more fully captures the housing need and as the statutory objectives of RHNA shift more housing planning near jobs, transit, and resources. The Southern California region's housing crisis requires each jurisdiction to plan for the housing needs of their community and the region. In recognition of this effort there are more resources available than ever before to support jurisdictions as they prepare to update their 6<sup>th</sup> cycle housing elements:

- SB 2 Planning Grants – \$123 million one-time allocation to cities and counties
- SB 2 Planning Grants Technical Assistance offered to all jurisdictions
- Regional and Local Early Action Planning Grants – \$238 million one-time allocation for local and regional governments
- SB 2 Permanent Local Housing Allocation – approximately \$175 million annually in ongoing funding for local governments to increase affordable housing stock

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Megan Kirkeby, Deputy Director, [megan.kirkeby@hcd.ca.gov](mailto:megan.kirkeby@hcd.ca.gov).



Megan Kirkeby  
Deputy Director



# City of Whittier

13230 Penn Street, Whittier, California 90602-1716  
(562) 567-9320 Fax (562) 567-2872 www.cityofwhittier.org

Electronically Transmitted to: [Housing@scag.ca.gov](mailto:Housing@scag.ca.gov)

December 10, 2020

RHNA Appeals Committee  
Southern California Association of Governments  
900 Wilshire Blvd, Suite 1700  
Los Angeles, CA 90017

**SUBJECT: City of Whittier's Comments on Appeals to the Sixth Cycle Regional Housing Needs Assessment (RHNA) Allocation**

Honorable Chair and Honorable Committee Members:

The City of Whittier ("City") appreciates the challenges that are inherent in allocating 1,341,827 housing units by the thousands (a 226% increase above the baseline 412,137 unit) to cities across Southern California, especially in built-out cities. However, the City is deeply concerned its housing allocation of 3,431 units from the State Department of Housing and Community Development ("HCD") and the Southern California Association of Government's ("SCAG") unit distribution methodology, along with recent housing legislation will fundamentally abridge the City's ability to develop effective land-use policies that are appropriate for managing the community's actual needs. The 878 units in the 5<sup>th</sup> cycle RHNA allocation has been increased by 290% to 3,431 units in the current 6<sup>th</sup> cycle. Particularly challenging in the 6<sup>th</sup> cycle, is the number of low and very low-income units (1,558) which combined with the moderate and above moderate unit totals forces unplanned and unnecessary residential densification of the community.

The affordable units are an unfunded mandate with very limited regional or State financial support for their development. Considering the affordable housing subsidies typically range from \$50,000 to \$250,000 per unit, the overall funding requirements could range from \$78,000,000 to \$390,000,000 which is clearly beyond the reach of the City of Whittier in that the City's general fund budget is just \$72,000,000 which already include \$2,000,000 annually to house the City's unsheltered residents in transitional housing. Additionally, the City only receives 7.5% of each property tax dollar to provide general services including police and library services.

The City is currently in the process of updating its Housing Element as well as the General Plan to incorporate the current RHNA allocation, so Whittier is acutely aware of the various housing needs as well as the potential obstacles, such as aging infrastructure and unplanned density, to creating the requisite housing within a city that

Attachment: Comments Received During the Comment Period (General) (Appeal of the Draft RHNA Allocation for the City of Downey)

is essentially built out. The changes in the State's housing laws (SB 35, SB 166 and AB 1397) have created additional constraints for the agencies and may severely impact the City's ability to accomplish our regional and local housing goals.

Since development in Whittier began more than 130 years ago, the City is virtually built-out with little developable vacant land outside of its designated open space areas that are dedicated to accommodating existing and future residents. While the City has made significant efforts through its specific plans to densify existing corridors and districts, the majority of Whittier's remaining single-family residential neighborhoods cannot accommodate similar densification. Furthermore, the hills north of Whittier contain regional open space, sensitive habitat and wildlife areas that must be preserved in perpetuity. There are also significant infrastructure and water service constraints that impact Whittier's ability to produce significantly more housing. Although these facts may not be desirable, they must be pragmatically accounted for and mitigated by not further increasing Whittier's share of housing units contained in SCAG's 6<sup>th</sup> Cycle RHNA. The final RHNA allocation and methodology must be fair and equitable while reflecting the capacity for reasonable housing unit construction.

As with many other cities, the City is concerned about the current allocation, but an even greater concern is that additional units may be applied to the City if reallocated from cities that are successful in their appeals. To that end, the City believes the appeal process itself was unclear as to the potential ramifications to other cities and not fully understood.

Although we fully support the surrounding cities in their appeals, the potential for additional units being applied to the City would exacerbate the problems described herein and in Whittier's September 13, 2019 letter to SCAG.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Jeffery S. Adams  
Director of Community Development

File

**From:** Christopher Koontz <Christopher.Koontz@longbeach.gov>  
**Sent:** Thursday, December 3, 2020 11:14 AM  
**To:** Regional Housing  
**Subject:** RHNA Appeals

**Categories:** Response Required, Record

Good morning,

The purpose of this email is to provide the City of Long Beach’s position in regards to pending RHNA appeals before SCAG. The City of Long Beach seeks to meet its housing needs and obligations for the benefit of Long Beach residents and the region. Our allocation was extremely large and presents a planning and financing challenge for the City. Nonetheless we chose not to appeal our allocation because the allocation process was fair and transparent including taking the City of Long Beach’s input into consideration.

We oppose and will not accept any transfer of additional allocation due to the pending appeals. We note that within our area, the Gateway COG, appeals are pending from Bellflower, Cerritos, Downey, Huntington Park, La Mirada, Lakewood, Pico Rivera, and South Gate. Each of these appeals should be evaluated by SCAG on the merits, however Long Beach opposes any transfer of allocation to our City. It would be inappropriate to transfer a further burden to Long Beach when we have already accepted a large allocation and have done more than many cities in the region to accommodate housing growth under the current RHNA cycle, including fully meeting our market-rate RHNA allocation.

The City of Long Beach will continue to work with SCAG and our neighbor jurisdictions to address the housing needs of our residents.

We thank you for consideration and please do not hesitate to contact the City regarding our position.

Christopher Koontz, AICP  
*Deputy Director*

Development Services  
411 W. Ocean Blvd., 3rd Floor | Long Beach, CA 90802  
Office: 562.570.6288 | Fax: 562.570.6068



Attachment: Comments Received During the Comment Period (General) (Appeal of the Draft RHNA Allocation for the City of Downey)



Southern California Association of Governments  
Remote Participation Only  
January 8, 2021

**To:** Regional Housing Needs Assessment Subcommittee (RHNA)

**EXECUTIVE DIRECTOR'S  
APPROVAL**

**From:** Karen Calderon, Associate Regional Planner,  
(213) 236-1983, calderon@scag.ca.gov

**Subject:** Appeal of the Draft RHNA Allocation for the City of Pico Rivera

**RECOMMENDED ACTION:**

Deny the appeal filed by the City of Pico Rivera (City) to reduce the Draft RHNA Allocation for the City by 3,251 units.

**STRATEGIC PLAN:**

This item supports the following Strategic Plan Goal 2: Advance Southern California’s policy interests and planning priorities through regional, statewide, and national engagement and advocacy.

**SUMMARY OF APPEAL:**

The City of Pico Rivera requests a reduction of its RHNA allocation by 3,251 units (from 3,939 units to 688 units) based on the following issues:

1. Application of the adopted Final RHNA Methodology for the 6<sup>th</sup> Cycle RHNA (2021-2029) - the RHNA allocation does not meet the housing objectives and is unfair as it assigns the City a disproportionately higher amount of lower income units, based upon a flawed methodology that is inconsistent with regional growth forecasts.
2. Distribution of household growth assumed for purposes of comparable Regional Transportation Plans - SCAG's RHNA methodology is inconsistent with the household growth projections determined in Connect SoCal Plan.
3. Sewer or water infrastructure constraints for additional development - adequate water supply capacity to accommodate the development of their RHNA allocation is not available.
4. Availability of land suitable for urban development or for conversion to residential use - the City is constrained due to flood risks and there is little vacant land suitable for residential uses and available sites may not meet AB 1397 requirements.
5. Changed circumstances - COVID-19 pandemic has affected the economy and housing dynamics resulting in a decrease need for housing.

**OUR MISSION**

*To foster innovative regional solutions that improve the lives of Southern Californians through inclusive collaboration, visionary planning, regional advocacy, information sharing, and promoting best practices.*

**OUR VISION**

*Southern California’s Catalyst for a Brighter Future*

**OUR CORE VALUES**

*Be Open | Lead by Example | Make an Impact | Be Courageous*

**RATIONALE FOR STAFF RECOMMENDATION:**

Staff have reviewed the appeal and recommend no change to the City of Pico Rivera's RHNA allocation. Regarding Issue 1, statute vests HCD with the authority to decide whether statutory objectives were met by the RHNA Methodology, and HCD made this determination. Also, the City is challenging the adopted RHNA Methodology rather than the application of the methodology. Additionally, the City's allocation of low-income units was conducted pursuant to the final RHNA methodology and in a fair and consistent manner across all local jurisdictions. Regarding Issue 2, the jurisdiction's RHNA allocation was assigned in a manner consistent with the development pattern in Connect SoCal. Regarding Issue 3, evidence from a utility service provider that would preclude the construction of new housing was not demonstrated. Issue 4 was not demonstrated to be an impediment to meeting Pico Rivera's RHNA allocation since AB 1397 does not preclude consideration of all non-vacant sites. Regarding Issue 5, evidence that COVID-19 reduces housing need for the entire RHNA planning period was not demonstrated. Moreover, impacts from COVID-19 are not unique to any single SCAG jurisdiction and no evidence was provided indicating that housing need within jurisdiction is disproportionately impacted in comparison to the rest of the SCAG region.

**BACKGROUND:****Draft RHNA Allocation**

Following the adoption of the Final RHNA Methodology on March 5, 2020 and the adoption of Connect SoCal on September 3, 2020, all local jurisdictions received draft RHNA allocations on September 11, 2020. A summary is below.

**Total RHNA for the City of Pico Rivera: 3,939 units**

Very Low Income: 1,149 units  
Low Income: 562 units  
Moderate Income: 572 units  
Above Moderate Income: 1,656 units

Additional background related to the Draft RHNA Allocation is included in Attachment 1.

**Summary of Comments Received during 45-day Comment Period**

No comments were received from local jurisdictions or HCD during the 45-day public comment period described in Government Code section 65584.05(c) which specifically regard the appeal filed for the City of Pico Rivera. Three comments were received which relate to appeals filed generally:

- HCD submitted a comment on December 10, 2020 delineating the statutory basis for RHNA appeals and the requirement that any appeals granted must include written findings regarding how revisions are necessary to further RHNA’s statutory objectives.
- The City of Whittier submitted a comment on December 10, 2020 supporting surrounding cities in their appeals but expressing concern that additional units may be applied to Whittier if reallocated from cities which are successful in their appeals.
- The City of Long Beach submitted a comment on December 3, 2020 indicating their view that the RHNA allocation process was fair and transparent, their support for evaluating appeals on their merits (specifically those from the Gateway Council of Governments), and their opposition to any action which would result in a transfer of additional units to Long Beach.

#### ANALYSIS:

***Issue 1: Application of the adopted Final RHNA Methodology for the 6th Cycle RHNA (2021-2029) [Government Code Section 65584.05 (b)(1)].***

*The City contends SCAG failed to determine Pico Rivera's share of the regional housing need in accordance with the information described in the Final RHNA Methodology established and approved by SCAG, and in a manner that furthers, and does not undermine the five objectives listed in Government Code Section 65584 (d). Additionally, the RHNA allocation is unfair as it assigns the City a disproportionately higher amount of lower income units, based upon a flawed methodology that is inconsistent with regional growth forecasts.*

**SCAG Staff Response:** SCAG’s adopted RHNA Methodology balanced a wide-range of policy and statutory objectives (i.e., the objectives set forth in Government Code section 65584(d)). For example, the methodology incorporates locally-envisioned growth from Connect SoCal, recognizes the importance of job and transit access in future housing planning, and demonstrates a commitment to social equity in the form of the social equity adjustment and the reallocation of residual housing need in lower-resourced jurisdictions to higher-resourced jurisdictions.

With respect to the statutory objectives, SCAG used objective measures to advance certain principles, but since local and regional conditions vary tremendously across the state and over time, there are few consistent quantitative standards which can be used to evaluate all aspects of the methodology. Ultimately, however, the RHNA statute vests HCD with the authority to decide whether statutory objectives have been met. On January 13, 2020, HCD found that SCAG’s (then draft) 6th cycle methodology advanced all five statutory objectives of RHNA.

Regarding the amount of low income units assigned to the jurisdiction, a regional determination of approximately 1.34 million units was issued by HCD on October 15, 2019 per state housing law, which included allocation by income categories in order to promote equity across the region. The RHNA methodology includes a minimum 150 percent social equity adjustment and an additional 10 to 30 percent added in areas with significant populations that are defined as very low or very high resource areas, to further the objectives of allocating a lower proportion of households by income and affirmatively furthering fair housing. A social equity adjustment ensures that jurisdictions accommodate their fair share of each income category. It does so by adjusting current household income distribution in comparison to county distribution. The result is that jurisdictions that have a higher concentration of lower income households than the county will receive lower percentages of RHNA for the lower income categories. As shown in Table 1, below, after the 150% equity adjustment, Pico Rivera’s Draft RHNA Allocation by income category is similar to the County’s distribution, and consistent with HCD’s regional determination by income category for the region.

Table 1: RHNA Allocation by Income Category

|                           | Very-low Income | Low Income | Moderate | Above Moderate | Total Units  |
|---------------------------|-----------------|------------|----------|----------------|--------------|
| <b>Region</b>             | 26%             | 15%        | 17%      | 42%            | 1.34 million |
| <b>Los Angeles County</b> | 26%             | 15%        | 16%      | 43%            | 813,082      |
| <b>Pico Rivera</b>        | 28%             | 14%        | 15%      | 43%            | 3,939        |

However, an appeal citing RHNA methodology as its basis must appeal the application of the adopted methodology, not the methodology itself. Since the final calculation of income levels was conducted pursuant to the final RHNA methodology and in a fair and consistent manner across all local jurisdictions, SCAG staff does not recommend a reduction to the jurisdiction’s draft RHNA allocation based on this factor.

Regarding inconsistencies between RHNA and Connect SoCal’s regional growth forecasts, see SCAG Staff Response for Issue 2, below.

**Issue 2: Distribution of household growth assumed for purposes of comparable Regional Transportation Plans [Section 65584.04(e)(3)].**

*The City argues SCAG's RHNA methodology is inconsistent with the household growth projections determined in Connect SoCal. Specifically, the City’s household growth projected over the 2045 forecast period in Connect SoCal results in an annual household growth of 66.5 households. The RHNA forecast growth amortized over the 8-year planning period results in growth of 492 housing units per year, which is 7.5 times above the Connect SoCal forecast. Therefore, the RHNA allocation is inconsistent with the 2045 growth forecast in Connect SoCal, which undermines the validity of the*



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*assumptions in the Draft RHNA Allocations and Government Code Section 65584(d)(1) by failing to provide the distribution of units in an equitable manner.*

**SCAG Staff Response:** As described in Attachment 1, Pico Rivera’s RHNA Draft Allocation is comprised of projected and existing need components. The projected need component is primarily based on household growth in Connect SoCal, SCAG’s 2020-2045 Regional Transportation Plan which was fully adopted in September 2020. For Pico Rivera, this amount is 657 units. Small adjustments are made to account for future vacancy (16 units) and replacement need (23 units).

Legislative changes in 2018 modified the nature of the regional housing need determination for the 6<sup>th</sup> cycle of RHNA by adding measures of household overcrowding and housing cost burden to the list of factors to be considered by HCD for the determination of housing need. As determined by HCD, a large share of the region’s housing need is based on factors other than future household growth and can be characterized as existing need. For Pico Rivera, this amounts to 3,283 units (83.3% of the City’s total need, see Attachment 1). These new measures are not included in the Connect SoCal Growth Forecast because they are not direct inputs to the growth forecasting process and are independent of employment and population projections. In contrast, they reflect additional latent housing needs in the current population (i.e., “existing need”) and would not result in a change in regional population. SCAG’s RHNA methodology explicitly ensures that these units are allocated to jurisdictions across the region based on measures of transit and job accessibility such that future housing development can maximize the use of public transportation and existing infrastructure.

Ultimately, the Regional Transportation Plan/Sustainable Communities Strategy is a related, but separate process from the Regional Housing Needs Assessment. The RHNA identifies anticipated housing need over a specified eight-year period and requires that local jurisdictions make available sufficient zoned capacity to accommodate this need. In contrast, the Connect SoCal Growth Forecast is an assessment of the reasonably foreseeable future pattern of growth given, among other factors described above, the availability of zoned capacity. For further discussion see Attachment 1 as well as Connect SoCal Master Response 1 at [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial\\_public-participation-appendix-2.pdf](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_public-participation-appendix-2.pdf)

In summary, Pico Rivera’s RHNA allocation is consistent with the distribution of household growth envisioned in Connect SoCal and maximizes the opportunity to match future housing unit growth with public transportation and existing transportation infrastructure. For this reason, SCAG staff does not recommend a reduction to its draft RHNA allocation based on this factor.

**Issue 3: Sewer or water infrastructure constraints for additional development [Section 65584.04(e)(2)(A)].**

*The City argues it does not have adequate water supply capacity to accommodate the development of their RHNA allocation. Pico Rivera has a finite amount of water it can draw from the Central Basin, controlled by the Department of Water Resources, and is not permitted to draw the additional water supply that would be needed to accommodate the City's RHNA allocation. Based on the City's 2015 Urban Water Management Plan, the City's RHNA allocation represents a dwelling unit growth that will exceed the City's available water supply totals by 2023. The City contends that a realistic estimate of future growth need should be directly tied to the realistic water capacity available within the City of Pico Rivera as described in the City's Urban Water Management Plan.*

**SCAG Staff Response:** For Government Code Section 65584.04(e)(2)(A) to apply in this case, the jurisdiction must be precluded from providing necessary infrastructure for additional development due to supply and distribution decisions made by a sewer or water provider other than the local jurisdiction. For the water constraints mentioned by the jurisdiction, it is not evident that the respective water provider has rendered a decision that would prevent the jurisdiction from providing necessary infrastructure to obtain the additional water supply necessary for its RHNA allocation. For this reason, SCAG staff does not recommend a housing need reduction based upon this planning factor.

**Issue 4: Availability of land suitable for urban development or for conversion to residential use [Section 65584.04(e)(2)(B)].**

*The entire City of Pico Rivera lies within the Whittier Narrows Dam's flood inundation area. Due to the high risk of flooding in the event of a Dam failure, Pico Rivera is extremely limited in areas where it can plan for future housing in a manner that is safe for future residents. The City contends that a realistic estimate of future growth need should be directly tied to the amount of available land within the City of Pico Rivera, suitable for urban development that is not subject to the risk of flooding.*

*The City of Pico Rivera further contends it is almost entirely built out, with little vacant land suitable for residential uses. AB 1397 requires land inventory sites be "available" and may only include non-vacant sites with realistic development potential (Govt Code Section 65583). Because much of the City's acreage may not meet AB 1397 requirements, it cannot be counted in the City's available land inventory for purposes of determining the City's RHNA allocation. Specifically, the City is developed with public facilities, open space, and critical infrastructure used for water conservation and flood management that cannot be used for residential development per the Army Corps. Government Code requires that 2021-2029 Housing Elements analyze the lease structures of potential candidate housing sites, which disqualifies most of the City's industrial areas. Commercial and retail areas are*

*also unlikely to be redeveloped as they provide employment for the City. To meet the RHNA allocation the City will need to rely on infill development, primarily in existing residential areas. Given the amount of available vacant land, it is unreasonable to assume the City will be able to demonstrate that the opportunity exists to develop the required 3,939 units on infill properties over the 8-year planning period, pursuant to the analysis required under AB 1397.*

**SCAG Staff Response:** Regarding the City's risk of flooding, per Government Code 65584.04(e)(2)(B), "the determination of land available suitable for urban development may exclude lands where the Federal Emergency Management Agency (FEMA) or the Department of Water Resources has determined that the flood management infrastructure designed to protect that land is not adequate to avoid the risk of flooding." While SCAG staff does not dispute that there may be areas at risk of flooding in the jurisdiction, the jurisdiction has not provided evidence that an agency or organization such as FEMA has determined that flood management infrastructure is inadequate to avoid flood risk in these areas. For these reasons, SCAG staff does not recommend a reduction to the jurisdiction's draft RHNA allocation.

Pursuant to Government Code Section 65584.04(e)(2)(B), SCAG "may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality" (which includes the land use policies in its General Plan). 'Available land suitable for urban development or conversion to residential use,' as expressed in 65584.04(e)(2)(b), is not restricted to vacant sites; rather, it specifically indicates that underutilized land, opportunities for infill development, and increased residential densities are a component of 'available' land. As indicated by HCD in its December 10, 2020 comment letter (HCD Letter):

"In simple terms, this means housing planning cannot be limited to vacant land, and even communities that view themselves as built out must plan for housing through means such as rezoning commercial areas as mixed-use areas and upzoning non-vacant land." (HCD Letter at p. 2).

As such, the City can consider other opportunities for development. This includes the availability of underutilized land, opportunities for infill development and increased residential densities, or alternative zoning and density. Alternative development opportunities should be explored further and could possibly provide the land needed to zone for the City's 6th cycle RHNA allocation.

Indeed, AB1397, reiterates this concept and sets forth housing element site inventories which specifically include nonvacant sites. SCAG acknowledges that AB 1397 modifies the housing element update process in Government Code Section 65583 and requires stronger justification for using certain types of sites to meet RHNA need, particularly nonvacant sites. While these statutory changes have increased the extent of analysis or supportive policy required to demonstrate development likelihood, they do not preclude the consideration of non-vacant sites. For example,

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page 25 of HCD's June 10, 2020 Housing Element Site Inventory Guidebook<sup>1</sup> covering Government Code Section 65583.2 states:

*The inventory analysis should describe development and/or redevelopment trends in the community as it relates to nonvacant sites, i.e., the rate at which similar sites have been redeveloped. This could include a description of the local government's track record and specific role in encouraging and facilitating redevelopment, adaptive reuse, or recycling to residential or more intensive residential uses. If the local government does not have any examples of recent recycling or redevelopment, the housing element should describe current or planned efforts (via new programs) to encourage and facilitate this type of development (e.g., providing incentives to encourage lot consolidation or assemblage to facilitate increased residential-development capacity). The results of the analysis should be reflected in the capacity calculation described in Part C, above.*

Thus, statute permits, and HCD has provided guidance on how, several approaches may be taken in order to demonstrate site suitability.

While the City provides a breakdown of the existing zoning and general uses within the City (i.e. open space, industrial, commercial, etc.), the inability to develop residential uses was not demonstrated at a parcel-level. The City can consider other opportunities for development. This includes the availability of underutilized land, opportunities for infill development and increased residential densities, alternative zoning and density, and accessory dwelling units. Alternative development opportunities should be explored further and could possibly provide the land needed to zone for the City's projected growth.

Note that while zoning and capacity analysis is used to meet RHNA need, they should not be used to determine RHNA need at the jurisdictional level. Per the adopted RHNA methodology, RHNA need at the jurisdictional level is determined by projected household growth, transit access, and job access. Housing need, both existing and projected need, is independent of zoning and other related land use restrictions, and in some cases is exacerbated by these very same restrictions. Thus, land use capacity that is restricted by factors unrelated to existing or projected housing need cannot determine existing or projected housing need. For these reasons, SCAG staff does not recommend a reduction to its draft RHNA allocation based on this factor.

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<sup>1</sup> [https://www.hcd.ca.gov/community-development/housing-element/docs/sites\\_inventory\\_memo\\_final06102020.pdf](https://www.hcd.ca.gov/community-development/housing-element/docs/sites_inventory_memo_final06102020.pdf)

**Issue 5:** Changed Circumstances [Government Code Section 65584.05(b)].

*COVID-19 presents an unforeseen change in circumstance that affects the City's economy and housing dynamics. While the City acknowledges the long-term impacts of COVID-19 on housing is unknown, it provides statistics to show that an above average portion of the population is choosing to cohabitate with other households or is unable to make rent payments. Economic hardships on homeowners, renters, cities, and developers will likely lead to a decreased demand for housing, as well as a decreased ability for the private market to create housing. The City's financial ability to assist in lower income housing production also decreased. Additionally, California is experiencing historically low growth trends with a "Freddie Mac" report from February 2020 indicating that California's shortage of housing units is 820,000, considerably lower than the 1.34 million provided by HCD for the SCAG region alone. Therefore, an inflated RHNA allocation will result in Pico Rivera and California drastically and incorrectly reshaping the housing landscape as opposed to organically responding to market trends.*

**SCAG Staff Response:** SCAG recognizes that COVID-19 presents unforeseen circumstances and that local governments have been affected by significant unemployment. However, these facts, as presented by the City, do not “merit a revision of the information submitted pursuant to subdivision (b) of Section 65584.04.” (Govt. Code § 65584.05(b)(3)). Furthermore, Section 65584.05(b) requires that:

“Appeals shall be based upon comparable data available for all affected jurisdictions and accepted planning methodology, and supported by adequate documentation, and shall include a statement as to why the revision is necessary to further the intent of the objectives listed in subdivision (d) of Section 65584.”

SCAG's Regional Council delayed the adoption of its 2020-2045 RTP/SCS by 120 days in order to assess the extent to which long-range forecasts of population, households, and employment may be impacted by COVID-19; however, the document's long-range (2045) forecast of population, employment, and household growth remained unchanged. The Demographics and Growth Forecast Technical Report<sup>2</sup> outlines the process for forecasting long-range employment growth which involves understanding national growth trends and regional competitiveness, i.e. the SCAG's region share of national jobs. Short-term economic forecasts commenting on COVID-19 impacts generally do not provide a basis for changes in the region's long-term competitiveness or the region's employment outlook for 2023-2045. As such, SCAG's assessment is that comparable data would not suggest long-range regional employment declines.

The COVID-19 pandemic has had various impacts throughout Southern California; however, it has not resulted in a slowdown in major construction nor has it resulted in a decrease in a demand for

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<sup>2</sup> See [https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal\\_Demographics-And-Growth-Forecast.pdf](https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal_Demographics-And-Growth-Forecast.pdf)

housing or housing need. Southern California home prices continue to increase (+2.6 percent from August to September 2020) led by Los Angeles (+10.4 percent) and Ventura (+6.2 percent) counties. Demand for housing as quantified by the RHNA allocation is a need that covers an 8-year period, not simply for impacts that are in the immediate near-term. A temporary increase in co-habiting households, delayed rent payments due to financial hardships, or growth trends cannot be considered a decrease in housing need, since there is no evidence that these trends will persist for the entire RHNA planning period. Moreover, impacts from COVID-19 are not unique to any single SCAG jurisdiction and no evidence has been provided in the appeal that indicates that housing need within jurisdiction is disproportionately impacted in comparison to the rest of the SCAG region. For these reasons, SCAG staff does not recommend a reduction to the jurisdiction's Draft RHNA Allocation.

In February 2020 national home lending agency Freddie Mac's Economic & Housing Research group prepared a national analysis of housing supply shortages titled "The Housing Supply Shortage: State of the States" (the Freddie Mac report). This information cannot now be considered for adjusting HCD's regional housing needs determination. The RHNA statute outlines a very specific process for arriving at a regional housing needs determination for RHNA. It also prescribes a specific timeline which necessitated the completion of the regional determination step by fall 2019 in order to allow enough time for the development of a methodology, appeals, and local housing element updates.

The defined timeframes are guided by the deadline for the housing element revisions for HCD's RHNA determination and SCAG's Final RHNA Allocation Plan. HCD, in consultation with each council of governments (COG), shall determine each region's existing and projected housing need pursuant to Section 65584.01 at least two years prior to the scheduled revision required pursuant to Section 65588. Govt. Code § 65584(b). This "determination shall be based upon population projections produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans, in consultation with each council of governments." Govt. Code § 65584.01(b). HCD begins the process 26 months prior to the scheduled revision so the data HCD relies on is the available provided by the COGs at that time. Similarly, the COG issues its survey for information to develop the RHNA allocation methodology up to 30 months prior to the scheduled revision. By necessity, the data used for these processes is data available at that time.

Without assessing the merits of the report, because the Freddie Mac report was not available during at the time HCD was determining regional housing need, it could not be considered then; and it cannot be considered now that the regional housing need has been determined. Furthermore, the Freddie Mac report is regional in nature and does not provide information on individual jurisdictions. For an appeal to be granted on the incorrect application of RHNA methodology, arguments and evidence must be provided that demonstrate the methodology was applied incorrectly to determine the jurisdiction's share of regional housing need. Because a regional study does not meet this criterion, these studies cannot be used to justify a particular

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jurisdiction's appeal. Moreover, any reduction would have to be redistributed to the region when in theory, all jurisdictions would be impacted by the regional study.

In sum, it would be untenable to reopen the process anytime new data or materials become available, particularly when there is a codified process. If so, there would be no finality to the process and local government could not meet the deadlines for their housing element updates. Procedurally, SCAG cannot consider a regional study outside of the regional determination process nor should it apply a regional study to reduce an individual jurisdiction's draft RHNA allocation. For these reasons, SCAG staff does not recommend a reduction to the jurisdiction's draft RHNA allocation.

**FISCAL IMPACT:**

Work associated with this item is included in the current FY20-21 Overall Work Program (300-4872Y0.02: Regional Housing Needs Assessment).

**ATTACHMENT(S):**

1. Local Input and Development of Draft RHNA Allocation (City of Pico Rivera)
2. Appeal Form and Supporting Documentation (City of Pico Rivera)
3. Comments Received During the Comment Period (General)

Southern California Association of Governments  
Remote Participation Only  
**City of Pico Rivera**  
**January 8, 2021**

## **Attachment 1: Local Input and Development of Draft RHNA Allocation**

This attachment sets forth the nature and timing of the opportunities which the City of Pico Rivera had to provide information and local input on SCAG's growth forecast, the RHNA methodology, and the Growth Vision of the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). It also describes how the RHNA Methodology development process integrates this information in order to develop the City of Pico Rivera's Draft RHNA Allocation.

### **1. Local Input**

#### ***a. Bottom-Up Local Input and Envisioning Process***

On October 31, 2017, SCAG took the first step toward developing draft RHNA allocations by initiating the Bottom-Up Local Input and Envisioning Process. At the direction of the Regional Council, the objective of this process was to seek local input and data to prepare for Connect SoCal and the 6<sup>th</sup> cycle of RHNA.<sup>1</sup> Each jurisdiction was provided with a package of land use, transportation, environmental, and growth forecast data for review and revision which was due on October 1, 2018.<sup>2</sup> While the local input process materials focus principally on jurisdiction-level and Transportation Analysis Zone (TAZ) level growth, input on specific parcels, sites, and project areas were welcomed and integrated into SCAG's growth forecast as well as data on other elements. SCAG met one-on-one with all 197 local jurisdictions between November 2017 and July 2018 and provided training opportunities and staff support. Following input from SCAG's Technical Working Group (TWG), the Connect SoCal growth forecast reflected precisely the jurisdiction-level growth totals provided during this process.

The local input data included SCAG's preliminary growth forecast information. For the City of Pico Rivera, the anticipated number of households in 2020 was 16,778 and in 2030 was 17,526 (growth of 748 households). In May 2018, SCAG staff met with local jurisdiction staff to discuss the Bottom-Up Local Input and Envisioning Process and answer questions. Input was not received. The preliminary figures above were used by SCAG.

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<sup>1</sup> While the RTP/SCS and RHNA share data elements, they are distinct processes. The RTP/SCS growth forecast provides an assessment of reasonably foreseeable future patterns of employment, population, and household growth in the region given demographic and economic trends, and existing local and regional policy priorities. The RHNA identifies anticipated housing need over a specified eight-year period and requires that local jurisdictions make available sufficient zoned capacity to accommodate this need. A further discussion of the relationship between these processes can be found in Connect SoCal Master Response 1 at: [https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal\\_Public-Participation-Appendix-2.pdf](https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal_Public-Participation-Appendix-2.pdf).

<sup>2</sup> A detailed list of data during this process reviewed can be found in each jurisdiction's Draft Data/Map Book at <http://scagrtpscs.net/Pages/DataMapBooks.aspx>



### ***b. RHNA Methodology Surveys***

On March 19, 2019, SCAG distributed a packet of methodology surveys, which included the local planning factor survey (formerly known as the AB2158 factor survey), Affirmatively Furthering Fair Housing (AFFH) survey, and replacement need survey, to SCAG jurisdictions' Community Development Directors. Surveys were due on April 30, 2019. SCAG reviewed all submitted responses as part of the development of the Draft RHNA Methodology. The City of Pico Rivera submitted the following surveys prior to the adoption of the Draft RHNA Methodology:

- Local planning factor survey
- Affirmatively Furthering Fair Housing (AFFH) survey
- Replacement need survey
- No survey was submitted to SCAG

### ***c. Connect SoCal Growth Vision and Additional Refinements***

Beginning in May 2018, SCAG's Sustainable Communities Working Group began the process of developing growth scenarios for the SCAG region. The culmination of this work was the development of the Connect SoCal Growth Vision, which directly uses jurisdictional-level growth projections from the Bottom-Up Local Input and Envisioning process, and also features strategies for growth at the TAZ-level that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Additional detail regarding the Connect SoCal Growth Vision, specifically the Transportation Analysis Zone (TAZ, or neighborhood) level projections is found at <https://www.connectsocial.org/Documents/DataMapBooks/Growth-Vision-Methodology.pdf>.

As a result of these strategies, in some jurisdictions growth at the TAZ-level differed from locally anticipated growth conveyed during the Bottom-Up Local Input and Envisioning Process.

As such, SCAG provided two additional opportunities for all local jurisdictions to make TAZ-level technical refinements on the topics of general plan capacities and entitlements. During the release of the draft Connect SoCal Plan, jurisdictions were notified on October 31, 2019 that SCAG would accept additional refinements until December 11, 2019. Following the Regional Council's decision to delay full adoption of Connect SoCal for 120 days due to the COVID-19 pandemic, all jurisdictions were again notified on May 26, 2020 that SCAG would accept additional refinements until June 9, 2020.

Connect SoCal Growth Vision data have been available to local jurisdiction staff during the entirety of this process through SCAG's Scenario Planning Model Data Management Site (SPM-DM) at <http://spmdm.scag.ca.gov> and updates were shared with local jurisdictions on technical refinements to the data in February 2020 and August 2020 to share the results of both review opportunities. SCAG received additional technical corrections from the City of Pico Rivera and incorporated them into the

Growth Vision. The City of Pico Rivera’s TAZ-level data utilized in the Connect SoCal Growth Vision matches input provided during the Bottom-Up Local Input and Envisioning Process.

## 2. Development of the Final RHNA Methodology

SCAG convened the first meeting of the RHNA Subcommittee in October 2018. In their subsequent monthly meetings, this body reviewed and advised on the development of SCAG’s 6<sup>th</sup> cycle RHNA process, including the development of the RHNA methodology. Per Government Code 65584.04(a), SCAG must develop a RHNA methodology which furthers the five statutory objectives of RHNA:

*(1) Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households.*

*(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region’s greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.*

*(3) Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.*

*(4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.*

*(5) Affirmatively furthering fair housing (Govt. Code § 65584(d)).*

As explained in more detail below, the Draft RHNA Methodology (which was adopted as the Final RHNA Methodology) set forth the policy factors, data sources, and calculations which would be used to generate draft RHNA allocations for all local jurisdictions. Following extensive debate and public comment, SCAG’s Regional Council voted to approve the Draft RHNA Methodology on November 7, 2019 and provide it to HCD for review. Per Government Code 65584.04(i), HCD is vested with the authority to determine whether a methodology furthers the objectives set forth in Government Code section 65584(d). On January 13, 2020, HCD found that the Draft RHNA Methodology furthers these five statutory objectives of RHNA. Specifically, HCD noted that:

*“This methodology generally distributes more RHNA, particularly lower income RHNA, near jobs, transit, and resources linked to long term improvements of life outcomes.*

*In particular, HCD applauds the use of the objective factors specifically linked the statutory objectives in the existing need methodology.” (Letter from HCD to SCAG dated January 13, 2020 at <https://scag.ca.gov/sites/main/files/file-attachments/hcd-review-rc-approved-draft-rhna-methodology.pdf?1602190239>).*

On March 5, 2020, again following extensive debate and public comment, the Regional Council voted to approve the Draft RHNA Methodology as the Final RHNA Methodology. Unlike SCAG’s 5<sup>th</sup> cycle RHNA methodology which relies almost entirely on the household growth component of the RTP/SCS, SCAG’s 6<sup>th</sup> cycle RHNA methodology consists of two primary elements: “projected need” which includes the number of housing units required to accommodate anticipated population growth over the 8-year RHNA planning period and “existing need,” which refers to the number of housing units required to accommodate excess or unsatisfied housing demand experienced by the region’s current population.<sup>3</sup> Furthermore, the Final RHNA methodology utilizes measures of 2045 job accessibility and High Quality Transit Area (HQT) population measures based on TAZ-level projections in the Connect SoCal Growth Vision.

More specifically, the Final RHNA Methodology considers three primary factors in determining a local jurisdiction’s total housing need which are primarily based on data from Connect SoCal’s aforementioned Bottom-Up Local Input and Envisioning Process:

- Forecasted growth over 2020-2030 (projected need)
- Transit accessibility in 2045 (existing need)
- Job accessibility in 2045 (existing need)

The methodology is described in further detail at: <http://scag.ca.gov/programs/Documents/RHNA/SCAG-Final-RHNA-Methodology-030520.pdf>.

### 3. Draft RHNA Allocation for the City of Pico Rivera

Following the adoption of the Final RHNA Methodology on March 5, 2020 and the 120 day delay due to the COVID-19 pandemic, SCAG adopted Connect SoCal on September 3, 2020, and the City of Pico Rivera received its draft RHNA allocation on September 11, 2020. Application of the RHNA methodology yields the draft RHNA allocation for the City of Pico Rivera as summarized in the data and calculations in the tables below.

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<sup>3</sup> Legislative changes in 2018 modified the nature of the regional housing need determination for the 6<sup>th</sup> cycle of RHNA by adding measures of household overcrowding and housing cost burden to the list of factors to be considered by HCD for the determination of housing need. These new measures are not included in the Connect SoCal Growth Forecast because they are not direct inputs to the growth forecasting process and are independent of employment and population projections. In contrast, they reflect additional latent housing needs in the current population (i.e. “existing need”) and would not result in a change in regional population. For further discussion see Connect SoCal Master Response 1 at [https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal\\_Public-Participation-Appendix-2.pdf](https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal_Public-Participation-Appendix-2.pdf).

**Pico Rivera city statistics and inputs:**

|  |           |
|--|-----------|
| Forecasted household (HH) growth, RHNA period:<br><i>(2020-2030 Household Growth * 0.825)</i>  | 617       |
| Percent of households who are renting:   | 33%       |
| Housing unit loss from demolition (2009-18):   | 23        |
| Adjusted forecasted household growth, 2020-2045:<br><i>(Local input growth forecast total adjusted by the difference between the RHNA determination and SCAG's regional 2020-2045 forecast, +4%)</i> | 1,762     |
| Percent of regional jobs accessible in 30 mins (2045):<br><i>(For the jurisdiction's median TAZ)</i>   | 20.99%    |
| Jobs accessible from the jurisdiction's median TAZ (2045):<br><i>(Based on Connect SoCal's 2045 regional forecast of 10.049M jobs)</i>   | 2,109,000 |
| Share of region's job accessibility (population weighted):   | 0.52%     |
| Jurisdiction's HQTAs population (2045):  | 20,254    |
| Share of region's HQTAs population (2045):   | 0.20%     |
| Share of population in low/very low-resource tracts:   | 13.98%    |
| Share of population in very high-resource tracts:  | 0.00%     |
| Social equity adjustment:  | 150%      |

| <b>Calculation of Draft RHNA Allocation for Pico Rivera city</b>  |             |
|---|-------------|
| Forecasted household (HH) growth, RHNA period:  | 617         |
| Vacancy Adjustment<br><i>(5% for renter households and 1.5% for owner households)</i>   | 16          |
| Replacement Need  | 23          |
| <b>TOTAL PROJECTED NEED:</b>  | <b>657</b>  |
| Existing need due to job accessibility (50%)  | 2171        |
| Existing need due to HQTAs pop. share (50%)   | 829         |
| Net residual factor for existing need<br><i>(Negative values reflect a cap on lower-resourced community with good job and/or transit access. Positive values represent this amount being redistributed to higher-resourced communities based on their job and/or transit access.)</i> | 283         |
| <b>TOTAL EXISTING NEED</b>  | <b>3283</b> |
| <b>TOTAL RHNA FOR PICO RIVERA CITY</b>  | <b>3939</b> |
| Very-low income (<50% of AMI)   | 1149        |
| Low income (50-80% of AMI)  | 562         |
| Moderate income (80-120% of AMI)  | 572         |
| Above moderate income (>120% of AMI)  | 1656        |

The transit accessibility measure is based on the population anticipated to live in High-Quality Transit Areas (HQTAs) in 2045 based on Connect SoCal’s designation of high-quality transit areas and population forecasts. With a forecasted 2045 population 20,254 living within HQTAs, the City of Pico Rivera represents 0.20% of the SCAG region’s HQTAs population, which is the basis for allocating housing units based on transit accessibility.

Job accessibility is defined as the jurisdiction's share of regional jobs accessible within a 30-minute drive commute. Since over 80 percent of the region's workers live and work in different jurisdictions, the RHNA methodology uses a measure based on Connect SoCal's travel demand model output for the year 2045 rather than assigning housing units based on the number of jobs with a specific jurisdiction. Specifically, the share of future (2045) regional jobs which can be reached in a 30-minute automobile commute from the local jurisdiction's median TAZ is used as to allocate housing units based on transit accessibility. From the City of Pico Rivera's median TAZ, it will be possible to reach 20.99% of the region's jobs in 2045 within a 30-minute automobile commute (2,109,000 jobs, based on Connect SoCal's 2045 regional job forecast of 10,049,000 jobs).

An additional factor is included in the methodology to account for RHNA Objective #5 to Affirmatively Further Fair Housing (AFFH). Several jurisdictions in the region which are considered disadvantaged communities (DACs) on the basis of access to opportunity measures (described further in the RHNA methodology document), but which also score highly in job and transit access, may have their total RHNA allocations capped based on their long-range (2045) household forecast. This additional housing need, referred to as residual, is then reallocated to non-DAC jurisdictions in order to ensure housing units are placed in higher-resourced communities consistent with AFFH principles. This reallocation is based on the job and transit access measures described above, and results in an additional 283 units assigned to the Pico Rivera.

Please note that the above represents only a partial description of key data and calculations in the RHNA methodology.

**Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form**

*All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.*

*Appeals and supporting documentation should be submitted to [housing@scag.ca.gov](mailto:housing@scag.ca.gov).*

*Late submissions will not be accepted.*

Date:

10/22/20

Jurisdiction Subject to This Appeal Filing:

*(to file another appeal, please use another form)*

City of Pico Rivera

Filing Party (Jurisdiction or HCD)

Jurisdiction - City of Pico Rivera

Filing Party Contact Name

Luis Rodriguez

Filing Party Email:

lrodriguez@pico-rivera.org

**APPEAL AUTHORIZED BY:**

Name: Michael L. Garcia

**PLEASE SELECT BELOW:**

- Mayor
- Chief Administrative Office
- City Manager
- Chair of County Board of Supervisors
- Planning Director
- Other: \_\_\_\_\_

**BASES FOR APPEAL**

- Application of the adopted Final RHNA Methodology for the 6<sup>th</sup> Cycle RHNA (2021-2029)
- Local Planning Factors and/or Information Related to Affirmatively Furthering Fair Housing (See Government Code Section 65584.04 (b)(2) and (e))
  - Existing or projected jobs-housing balance
  - Sewer or water infrastructure constraints for additional development
  - Availability of land suitable for urban development or for conversion to residential use
  - Lands protected from urban development under existing federal or state programs
  - County policies to preserve prime agricultural land
  - Distribution of household growth assumed for purposes of comparable Regional Transportation Plans
  - County-city agreements to direct growth toward incorporated areas of County
  - Loss of units contained in assisted housing developments
  - High housing cost burdens
  - The rate of overcrowding
  - Housing needs of farmworkers
  - Housing needs generated by the presence of a university campus within a jurisdiction
  - Loss of units during a state of emergency
  - The region's greenhouse gas emissions targets
  - Affirmatively furthering fair housing
- Changed Circumstances (Per Government Code Section 65584.05(b), appeals based on change of circumstance can only be made by the jurisdiction or jurisdictions where the change in circumstance occurred)

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_

Hearing Date: \_\_\_\_\_

Planner: \_\_\_\_\_

**Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form**  
*All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.*  
*Appeals and supporting documentation should be submitted to [housing@scaq.ca.gov](mailto:housing@scaq.ca.gov).*  
*Late submissions will not be accepted.*

**Brief statement on why this revision is necessary to further the intent of the objectives listed in Government Code Section 65584 (please refer to Exhibit C of the Appeals Guidelines):**

**Please include supporting documentation for evidence as needed, and attach additional pages if you need more room.**

Section 65584(d)(1) - The Draft RHNA allocation undermines this objective as it does not assign housing unit growth need in an equitable manner. The allocation is a marked increase in allocations from prior RHNA planning cycles and a disproportionately higher amount of lower income need to the community, based upon a flawed methodology that is inconsistent with regional growth forecasts at the regional, state and federal level.

**Brief Description of Appeal Request and Desired Outcome:**

See attached Appeal Letter for a full description of the appeal request.

The appeal is based on the following grounds: 1) Local Planning Factors- a variety of local factors directly impact future housing production; 2) Methodology to develop RHNA Allocations for Pico Rivera; and 3) Changed Circumstances impacting the City subsequent to the development of the RHNA Methodology.

The City of Pico Rivera is requesting a RHNA reduction from 3,939 units to 688

**Number of units requested to be reduced or added to the jurisdiction's draft RHNA allocation (circle one):**

Reduced 3,251          Added \_\_\_\_\_

**List of Supporting Documentation, by Title and Number of Pages**

**(Numbers may be continued to accommodate additional supporting documentation):**

1. City of Pico Rivera Appeal of the Sixth Cycle Draft RHNA Allocation - 18 Pages
  
- 2.
  
- 3.

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_

Hearing Date: \_\_\_\_\_

Planner: \_\_\_\_\_





**Michael L. Garcia**  
Director

City of Pico Rivera  
**COMMUNITY AND ECONOMIC  
DEVELOPMENT DEPARTMENT**

6615 Passons Boulevard · Pico Rivera, California 90660

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e-mail: [communitydevelopment@pico-rivera.org](mailto:communitydevelopment@pico-rivera.org)

**City Council**

Gustavo V. Camach  
Mayor  
Raul Eliá  
Mayor Pro Te.  
Gregory Salcid  
Councilmemb  
Dr. Monica Sánche  
Councilmemb  
Brent A. Tercer  
Councilmemb

October 22, 2020

Southern California Association of Governments

Attn: Peggy Huang, Executive Director

900 Wilshire Blvd., Suite 1700

Los Angeles, CA 90017

**Subject: City of Pico Rivera Appeal of Draft Housing Unit Allocation for the Sixth Cycle Housing Element (2021-2029)**

Dr. Ms. Huang:

On behalf of our residents, in accordance with applicable Government Code provisions, the City of Pico Rivera (City) hereby submits its appeal to the Southern California Association of Governments (SCAG) of SCAG's Final Draft Housing Unit Allocation (Final Draft Allocation), released September 3, 2020, which is based on the Final Regional Housing Needs Assessment (RHNA) Methodology for the Sixth Housing Element Cycle (2021-2029) for the SCAG region (referred to herein as the Sixth Cycle) also adopted by the SCAG Board of Directors on that date.

A revision to the Final Draft Allocation is necessary to further the intent of the statutorily mandated objectives listed in Government Code Section 65584(d). This appeal is consistent with, and not to the detriment of, the development pattern in the applicable sustainable communities strategy (SCAG's Connect SoCal Plan) developed pursuant to Government Code Section 65080(b)(2) as explained herein.

**INTRODUCTION**

The methodology used to determine the 6<sup>th</sup> Cycle RHNA allocation results in an increase in the number of housing units allocated to the City of Pico Rivera from 850 units for the 5th cycle Housing Element to a proposed 3,939 units. The proposed dwelling unit allocation increase is based on flawed methodologies that are in conflict with the determinations found within the Connect SoCal Plan and do not fully consider local planning factors unique to the City.

Pursuant to Government Code section 65584.05, Pico Rivera is exercising its right to file an appeal to modify its allocated share or another jurisdiction's share of the regional housing need included as part of SCAG's Draft Regional Housing Needs Assessment (RHNA) Allocation Plan.

Attachment: Appeal Form and Supporting Documentation (City of Pico Rivera) (Appeal of the Draft RHNA Allocation for the City of Pico Rivera)

**City of Pico Rivera**

SCAG RHNA Appeal 2021-2029

**Basis for the City of Pico Rivera Appeal**

A revision to the Final Draft Allocation is necessary to further the intent of the statutorily mandated objectives listed in Government Code Section 65584(d). In addition, this appeal is consistent with, and not to the detriment of, the development pattern in the applicable sustainable communities strategy (SCAG's Connect SoCal Plan) developed pursuant to Government Code Section 65080(b)(2) as explained herein.

This appeal is based on the following grounds:

1. *METHODOLOGY - SCAG failed to determine Pico Rivera's share of the regional housing need in accordance with the information described in the Final RHNA Methodology established and approved by SCAG, and in a manner that furthers, and does not undermine the five (5) objectives listed in Government Code Section 65584(d). These objectives are:*
  - i. *Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households.*
  - ii. *Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.*
  - iii. *Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.*
  - iv. *Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.*
  - v. *Affirmatively furthering fair housing.*
  
2. *LOCAL PLANNING FACTORS AND INFORMATION AFFIRMATIVELY FURTHERING FAIR HOUSING - SCAG failed to consider information submitted by Pico Rivera relating to certain local factors outlined in Govt. Code § 65584.04(e) and information submitted by the local jurisdiction relating to affirmatively furthering fair housing pursuant to Government Code § 65584.04(b)(2) and 65584(d)(5) [NO INFORMATION FOUND THAT WAS SUBMITTED]*
  
3. *CHANGED CIRCUMSTANCES - That a significant and unforeseen change in circumstance has occurred in Pico Rivera after April 30, 2019 and merits a revision of the information previously submitted by Pico Rivera. Appeals on this basis shall only be made by the jurisdiction or jurisdictions where the change in circumstances has occurred.*

The City hereby submits its appeal of the Draft Allocation, pursuant to Govt. Code Section 65584. 05. (Govt. Code Section 65584. 05(b).) As described in the introduction, the City is basing its appeal on the following criteria.

|          |                    |  |
|----------|--------------------|--|
| <b>1</b> | <b>Methodology</b> | SCAG failed to determine the share of the regional housing need in accordance with the information described in, and the methodology established pursuant to Section 65584.04, and in a manner that furthers, and does not undermine, the intent of the objectives listed in Section 65584(d). |
|----------|--------------------|--|

**(A) SCAG’s proposed methodology is inconsistent with the household growth projections determined in the Connect SoCal Plan.**

SCAG failed to adequately consider local household growth factors and utilized growth projections inconsistent with the Connect SoCal Plan.

SCAG’s Connect SoCal Plan, a 25-year plan, was formally adopted September 3, 2020. Appendix 1- Demographics and Growth Forecast of the Connect SoCal Plan<sup>1</sup>, list Pico Rivera’s household growth is forecasted to reach 18,500 in 2045. Comparatively, the 5-year estimates in the Census’ American Community Survey from 2018 for the City of Pico Rivera currently estimates 17,244 households.

**Table 1** shows a comparison between the annual household development projections in the Connect SoCal Plan and the City’s RHNA allocation. When the projected Connect SoCal forecast growth is projected over the forecast period, it results in an annual household growth of 66.5 households. The RHNA forecast growth amortized over the 8 year planning period results in growth of 492 housing unit per year. This results in an additional 426 housing units per year over the projected household growth in the Connect SoCal Plan. If RHNA development was achieved, the City would hit its projection growth needs identified in the Connect SoCal Plan in 4 years, approximately 26 years early.

**TABLE 1: Comparison of Household Growth Rates (Connect SoCal vs. RHNA)**

| Connect SoCal Forecasted Households Units (2016-2045) | Connect SoCal Forecast Year | Average per year household units creation (2016-2045) | RHNA Estimate Total Growth Need | RHNA Forecast Year | Average per year household units creation (2021-2029) |
|---|-----------------------------|---|---------------------------------|--------------------|---|
| 1,900   | 2045                        | 65.5  | 3,939                           | 2029               | 492   |

The City contends that the household formation assumed in the RHNA far exceeds any reasonable projection for growth during the 2021-2029 Housing Element planning period. SCAG’s own 2045 growth forecast, stated in the Connect SoCal Plan is inconsistent and directly undermines the validity of the assumptions in the Draft RHNA Allocations

<sup>1</sup> Connect SoCal (2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy) Appendix 1, Table 14.

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More recently, a Federal Home Loan Mortgage Corporation (“Freddie Mac”) report (February 2020) indicates that all of California “has a shortage of 820,000 housing units,” which is considerably lower than the 1.34 million provided by State HCD for the SCAG region alone. Since the SCAG region is 47.8% of the State’s population per DOF’s May 2020 E-5 estimates, the SCAG regional allocation would be closer to 392,075 units. If the regional need assumed by SCAG of 1,341,827 units is revised to 392,075, the City would have a draft RHNA of 1,150 units rather than the 3,939 units for this upcoming 6th Housing Element Cycle.

The discrepancy demonstrates the RHNA allocation undermines Government Code Section 65584(d)(1) by failing to provide the distribution of units in an equitable manner. This is demonstrated by a household growth rate that is 7.5 times above Connect SoCal forecasts. The City contends that a realistic estimate of future growth need should be directly tied to realistic projections of household formation, consistent with SCAG’s own projections in the Connect SoCal Plan.

|  |                             |  |
|--|-----------------------------|--|
| <b>2</b>   | <b>Changed Circumstance</b> | A significant and unforeseen change in circumstances has occurred in the local jurisdiction or jurisdictions that merits a revision of the information submitted pursuant to Section 65584. 04(b). |
| <i>Lack of capacity for sewer or water service due to federal or 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.</i> |                             |  |

**(A) The City of Pico Rivera does not have adequate water supply capacity to accommodate development of their 2021-2029 RHNA. The City receives water supply from the Central Basin groundwater Basin, which is controlled by the Department of Water Resources (DWR).**

Infrastructure Capacity

The City of Pico Rivera receives water service from two independent water purveyors. These are the Pico Rivera Water Authority (PRWA) and Pico Water District (PWD). In 2015, the City of Pico Rivera completed their Urban Water Management Plan (UWMP)<sup>2</sup>, which provides information on the water supply available within the City over the next 25 years and the anticipated demand based on census growth trends. The following information is from the City’s current UWMP regarding the supply capacity of the City’s larger water purveyor, PRWA.

The Urban Water Management Planning Act states that every urban water supplier shall include, as part of its plan, an assessment of the reliability of its water supplies. The water supply and demand assessment must compare the total projected water use with the expected water supply over the next 25 years in 5-year increments. This reliability assessment is required for normal, single dry-year and multiple dry water years. The City of Pico Rivera completed this assessment as part of their 2015 UWMP and the results are shown in the following section.

<sup>2</sup> <http://www.pico-rivera.org/civicax/filebank/blobdload.aspx?blobid=52378>

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The UWMP used the following growth assumptions based on 2010 US Census population counts for its future demand projections. The UWMP also assumed an average of 3.8 residents per dwelling unit and stated that PRWA’s service area is built-out and increased future densification will come from anticipated densification within existing residential areas. As shown in the table below, the City is anticipated to add 3,272 residents between 2020 and 2030, which equates to 327 residents per year and at the assumed rate of 3.8 residents per household, **86 dwelling units per year**.

**TABLE 2: UWMP – Population Assumptions**

|                             | 2015   | 2020   | 2025   | 2030   | 2035   |
|-----------------------------|--------|--------|--------|--------|--------|
| PRWA Service Area           | 40,934 | 41,936 | 42,963 | 42,963 | 44,014 |
| City of Pico Rivera         | 64,482 | 66,061 | 67,677 | 69,334 | 70,570 |
| Compound Annual Growth Rate | 0.40%  | 0.40%  | 0.40%  | 0.40%  | 0.40%  |

Notes: Derived by Atkins for 2015 UWMP Update based on 2010 US Census population counts within the City of Pico Rivera that reflects changes in population (a Citywide decline in between 2000 and 2010) due to a downturn in economic conditions

Based on actual water deliveries measures for the year 2015, PRWA had 8,959 residential accounts which used a total volume of 3,611 acre-feet (AF) of water as shown below. That is .403 AF per account, with the majority of accounts attributed to one dwelling unit.

**TABLE 3: UWMP – Water Deliveries (Actual, 2015)**

| Water Use Sectors                       | 2015 Metered  |             |
|---|---------------|-------------|
|   | # of accounts | Volume (AF) |
| Single-family residential               | 8,959         | 3,611       |
| Multi-family residential                |               |             |
| Commercial / Institutional/Governmental | 432           | 945         |
| Total                                   | 9,391         | 4,561       |

Source: DWR Water Report for PRWA

The table below shows projected demand and supply during normal years. The projected supply in this table is less than the projected demand, however the UWMP states that these assumptions do not hold true if increasing densification within PRWA’s service areas increased demand above 5,779 acre feet per year (AFY).

**TABLE 4: UWMP – Supply and Demand Comparison – Normal Year (AF)**

**Table 36 Supply and Demand Comparison — Normal Year (AF)**

| Water supply sources | 2020  | 2025  | 2030  | 2035  |
|----------------------|-------|-------|-------|-------|
| Groundwater          | 5,579 | 5,579 | 5,579 | 5,579 |
| Recycled Water       | 200   | 200   | 200   | 200   |
| Supply totals        | 5,779 | 5,779 | 5,779 | 5,779 |
| Demand totals        | 5,365 | 5,364 | 5,388 | 5,412 |
| Difference           | 414   | 415   | 391   | 367   |

Note: Application of GPCD used to determine projected demand over 25-year planning horizon.

**Conclusion**

Based on the information provided and the assumptions made in the City’s UWMP regarding project water deliveries (Table 5), the City’s RHNA allocation represents a dwelling unit growth that will exceed the City’s available water supply totals by 2023. Table 6 shows the City’s assumptions within the UWMP compared to the dramatically increased density that would result from development of the units in the City’s proposed RHNA allocation.

PRWD receives all of its water supply from the Central Basin groundwater basin, for which the Department of Water Resources (DWR) is the Watermaster. Pico Rivera has a finite amount of water it can draw from the Central Basin and is not permitted to draw the additional water supply that would be needed to accommodate the City’s RHNA. The discrepancy demonstrates the RHNA allocation undermines Government Code Section 65584(d)(2)(A) by failing to provide the distribution of units in an equitable manner. The City contends that a realistic estimate of future growth need should be directly tied to the realistic water capacity available within to the City of Pico Rivera as described in the City’s Urban Water Management Plan.

**TABLE 5: UWMP – Water Deliveries (Projected 2020, 2025, 2030, and 2035 (AF))**

| Water Use Sectors                       | 2020         | 2025         | 2030         | 2035         |
|---|--------------|--------------|--------------|--------------|
| Single-family residential               | 3,463        | 3,461        | 3,545        | 3,632        |
| Multi-family residential                | 269          | 269          | 275          | 282          |
| Commercial / Institutional/Governmental | 974          | 973          | 997          | 1,021        |
| Landscape (Recycled Water)              | 200          | 200          | 200          | 200          |
| Other                                   | 6            | 6            | 6            | 6            |
| <b>Total</b>                            | <b>4,912</b> | <b>4,909</b> | <b>5,023</b> | <b>5,141</b> |

Note: A one-percent increase per five years was applied to both the number of accounts and the total deliveries.

**TABLE 6: Comparison of Water Demand (UWMP vs. RHNA)**

| Growth Assumption                | Anticipated Dwelling Unit Growth per year (DU) | Projected 2020-2030 Increase in Water Deliveries for Residential (AF) | 2030 Total Anticipated Demand Including All Uses (AF) | 2030 Capacity |
|----------------------------------|--|---|---|---------------|
| City of Pico Rivera UWMP (2015)  | 86   | 88  | 5,023   | 5,779         |
| City’s 2021-2029 RHNA Allocation | 492  | 1,982   | 6,917   | 5,779         |

**(B) Flood Inundation Area**

The entire City of Pico Rivera lies within the flood inundation area (See **Figure 1**) of the Whittier Narrows Dam (Dam). Flood risk for this structure under normal operations or as a consequence of an event such as an earthquake is classified as high by both the U.S. Army Corps of Engineers (Army Corp) Dam Safety Action Classification (DSAC) System, and the FEMA HAZUS program. The Dam has a risk characterization of “DSAC 1” by the Army Corps due to the risk of life loss of life with very high likelihood of failure of the

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Dam by a rare flood event. The Dam is the only DSAC 1 dam in the nation. The Army Corps prepared a Dam Safety Modification Study in May 2019 that proposed alternatives or risk management plans (RMPs) to reduce the potential for and consequences of catastrophic flooding resulting from failure of the Dam during rare to extremely rare flood events. The goal is to be ready to start construction on these safety modifications in 2021.

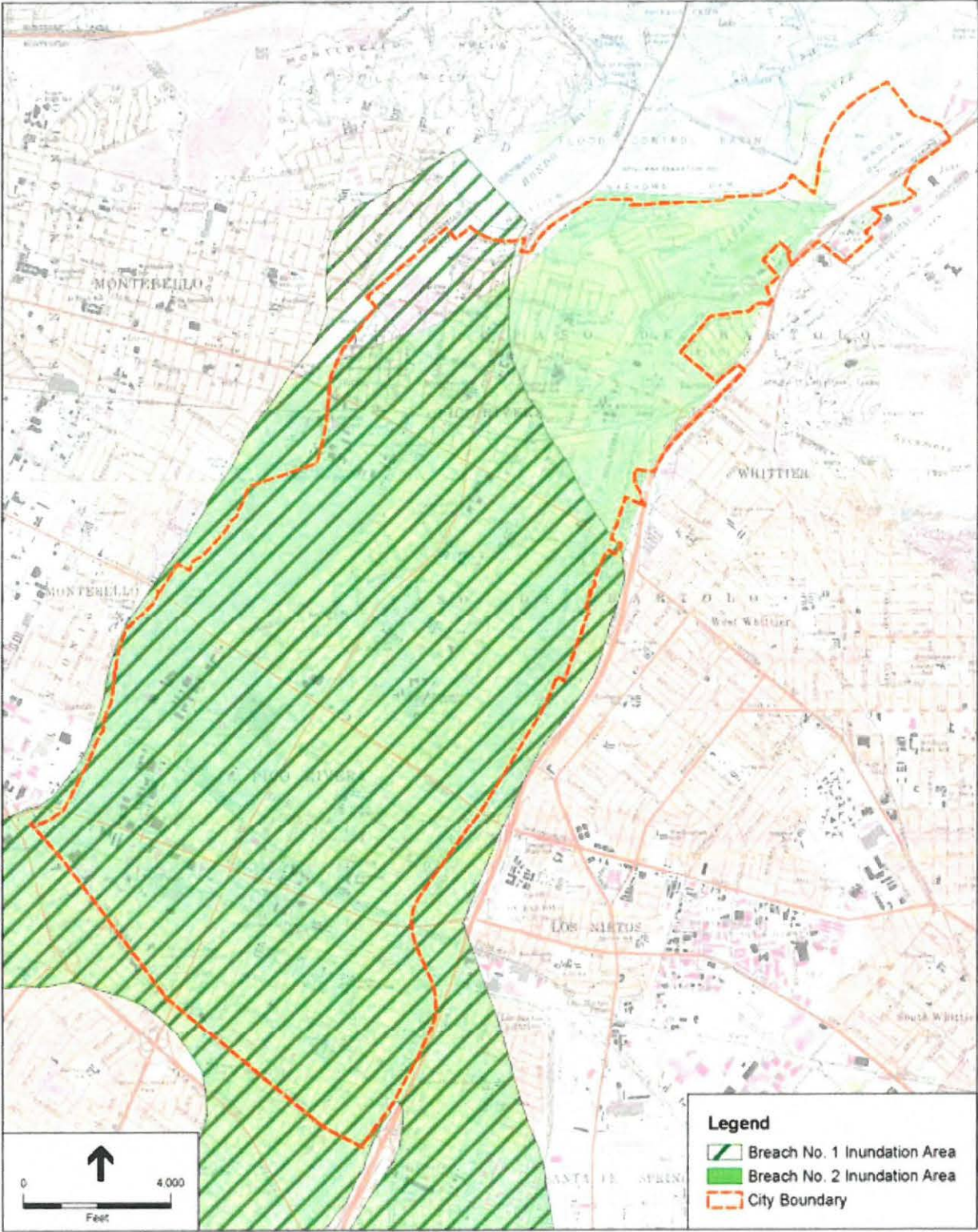
Potential Failure Modes (PFMs) are used to describe the manner in which the Dam could fail. The Army Corp report identified two PFMs that dominate the risk at the Dam and set the basis for plan formulation. They consist of backward erosion piping (BEP) in the foundation and overtopping. A third PFM, premature opening of the automatic spillway gates, is currently being addressed through operations and maintenance actions, and, accordingly, the RMPs developed for the Dam. If either of these two PFMs, or any other failures within the Whittier Narrows Dam structure, were to occur, there is the potential for significant flood damage encompassing the majority of the City of Pico Rivera.

### Conclusion

Due to the high risk of flooding in the event of a Dam failure, Pico Rivera is extremely limited in areas where it can plan for future housing in a manner that is safe for future residents. The discrepancy demonstrates the RHNA allocation undermines Government Code Section 65584(d)(2)(B) by failing to provide the distribution of units in an equitable manner.

The City of Pico Rivera contends that a realistic estimate of future growth need should be directly tied to the amount of available land within the City of Pico Rivera, suitable for urban development that is not subject to the risk of flooding, if flood management infrastructure fails.

FIGURE 1 – Pico Rivera Dam Inundation





|   |                              |  |
|---|------------------------------|--|
| <b>3</b>  | <b>Changed Circumstances</b> | A significant and unforeseen change in circumstances has occurred in the local jurisdiction or jurisdictions that merits a revision of the information submitted pursuant to Section 65584. 04(b). |
| <i>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</i> |                              |  |

The City of Pico Rivera is almost entirely built out, with little to no available vacant land to accommodate the number of housing units anticipated by the City’s draft RHNA allocation. The areas described within this section demonstrate that the realistic availability of land suitable for urban development or for conversion to residential uses is dramatically less than was considered when assigning the City’s RHNA allocation. As a built out City, Pico Rivera has little to no vacant land which means that the City will need to rely on infill development, primarily in existing commercial and residential areas. The information below shows that many of these areas may not meet the AB 1397 requirements as outlined below and therefore, cannot be counted in the City’s available land inventory for purposes of determining the City’s RHNA allocation for the 6<sup>th</sup> Cycle. These areas, and the total acreage allocated to each, are shown in Table 7 below.

**Table 7: Existing City Acreages**

| Total City Acreage | Existing Open Space & Public Facilities | Existing Industrial | Existing Commercial | Existing SFR and PUD | Remaining Potentially Developable Area |
|--------------------|---|---------------------|---------------------|----------------------|--|
| 4738               | 1603                                    | 764                 | 222                 | 2142                 | 7                                      |
| 100%               | 34%                                     | 16%                 | 5%                  | 45%                  | <1%                                    |

Recently enacted AB 1397 modified Government Code section 65580,65583 and 65583.2. Generally, jurisdictions must demonstrate the following:

- Land Inventory Sites Must Be “Available” and May Only Include Non-Vacant Sites with Realistic Development Potential (Govt Code Section 65583).
- Sites in the Land Inventory Must Have Demonstrated Potential for Development (Govt Code Section 65583(a)(3))

This provision in state law requires the City to explicitly demonstrate the availability of vacant lands to accommodate future housing growth need.

**(a) Existing Public Facilities, Open Space, and Critical Infrastructure Areas**

There is approximately 1,603 acres of Public Facilities and Open Space within Pico Rivera. The majority of this land is critical water conservation and flood management infrastructure that serves not only the City, but neighboring cities within the region. Included in this are the Rio Hondo and San Gabriel Spreading Grounds, which serve as water storage/groundwater recharge facilities that conserve approximately 150,000 acre-feet of local, imported, and reclaimed water annually.

Open space within Pico Rivera is primarily situated around the San Gabriel River, including the Pico Rivera Bicentennial Park and Sports Arena. These spaces are not able to be utilized for residential buildings per the Army Corps, and serve as vital flood overflow areas that help to prevent further damage to the surrounding areas.

As this is critical infrastructure for the region, it cannot be anticipated to redevelop within the planning period. **Figure 2** shows the location and size of the Public Facilities and Open Space areas within Pico Rivera.

**(b) Existing Industrial Areas**

There is approximately 764 acres of heavy and light industrial uses within Pico Rivera, including a number of parcels within an entitled specific plan area. Many of these buildings were built within the last 20 years and contain lease structures that span 99 years. The Government Code requires that 2021-2029 Housing Elements analyze, to the extent possible, the lease structures of potential candidate housing sites. Lease structures found to exceed the planning period are not considered as sites that can realistically be expected to redevelop for residential uses within the planning period. **Figure 3** shows the location and size of the existing industrial areas within Pico Rivera.

**(c) Existing Commercial Areas**

There is approximately 222 acres of commercial/retail land within Pico Rivera. Much of the existing commercial and retail lands in the city are built out and highly utilized. As the primary generator of employment in the City, these lands possess some of the most successful and viable investments within the City. Redevelopment of these parcels of these sites to accommodate the RHNA allocations is highly unlikely as these are some of the primary job-creating uses within the City. **Figure 4** shows the location and size of the existing commercial areas within Pico Rivera.

**(d) Existing Non-Vacant Residential and Planned Unit Development (PUD) Areas**

There is approximately 1,913 acres of single-family residential land within Pico Rivera. As shown in **Figure 5**, the majority of existing residential land consists of currently developed properties. There is little to no vacant land currently available to provide additional opportunities for residential development. Therefore, future residential development must be accommodated on infill, reuse and redevelopment of these existing residential properties.

Figure 2 – Pico Rivera Public Facilities and Open Space Areas

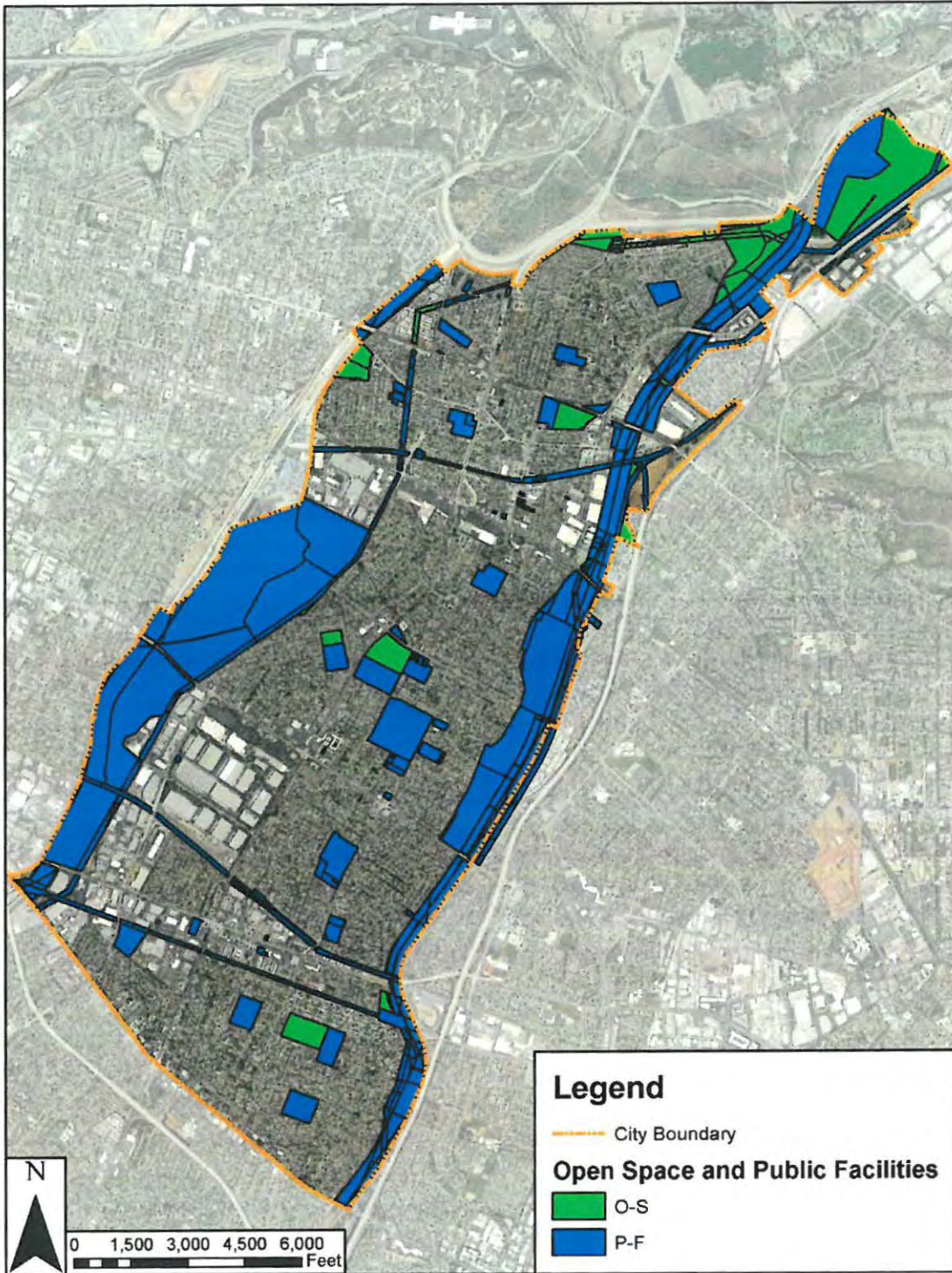


Figure 3 – Pico Rivera Industrial and Specific Plan Areas

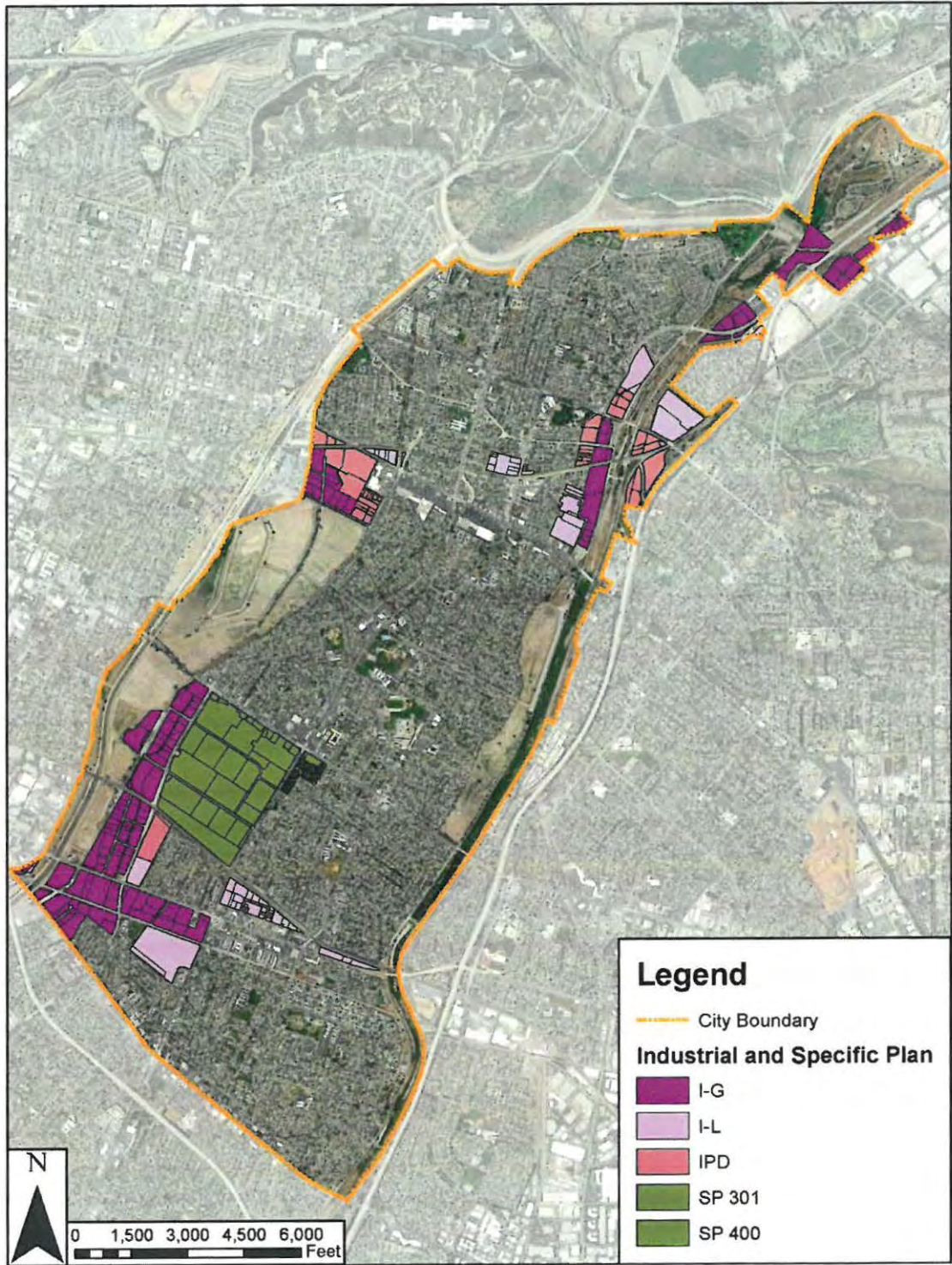


Figure 4 – Pico Rivera Commercial Areas

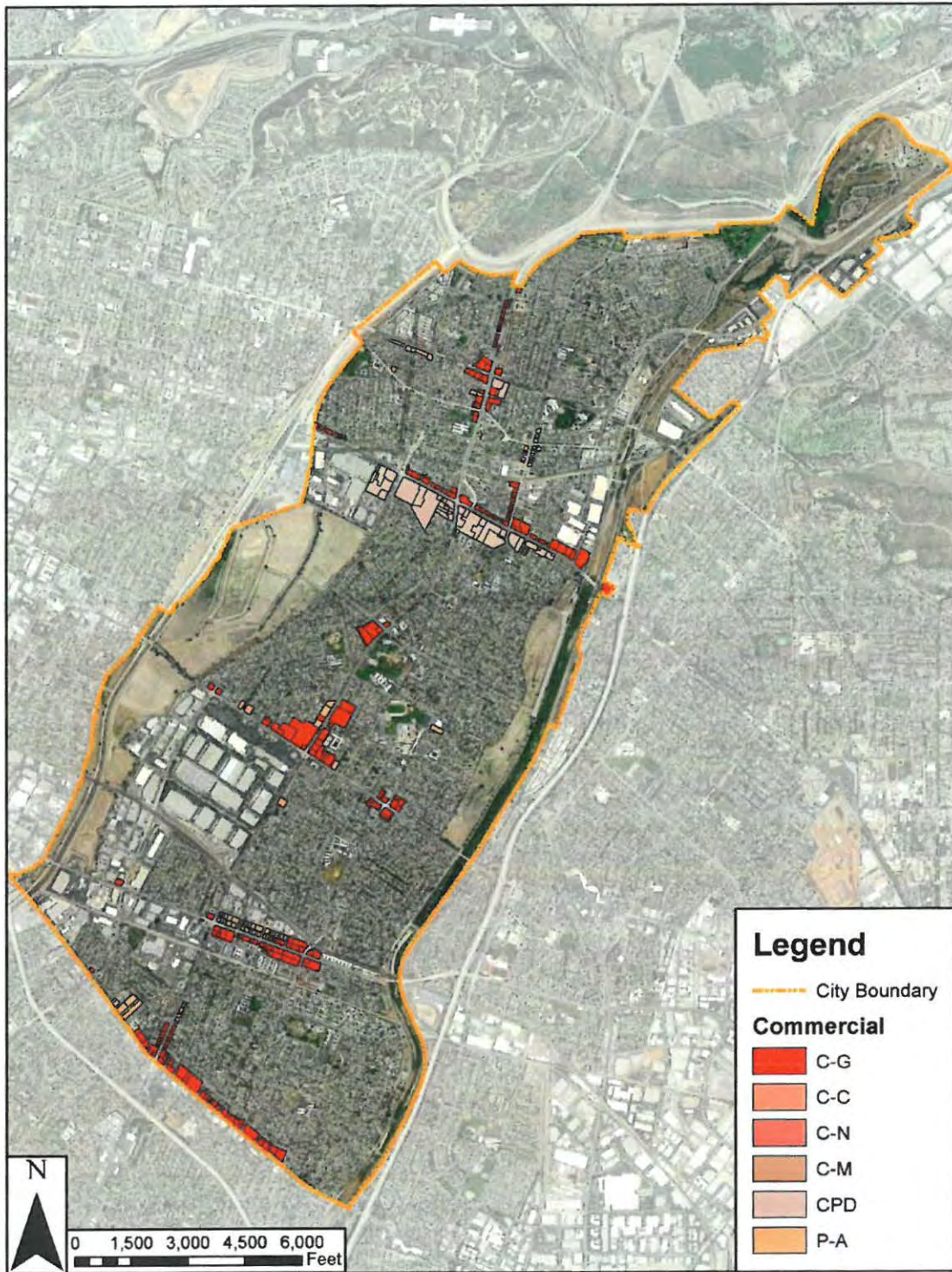
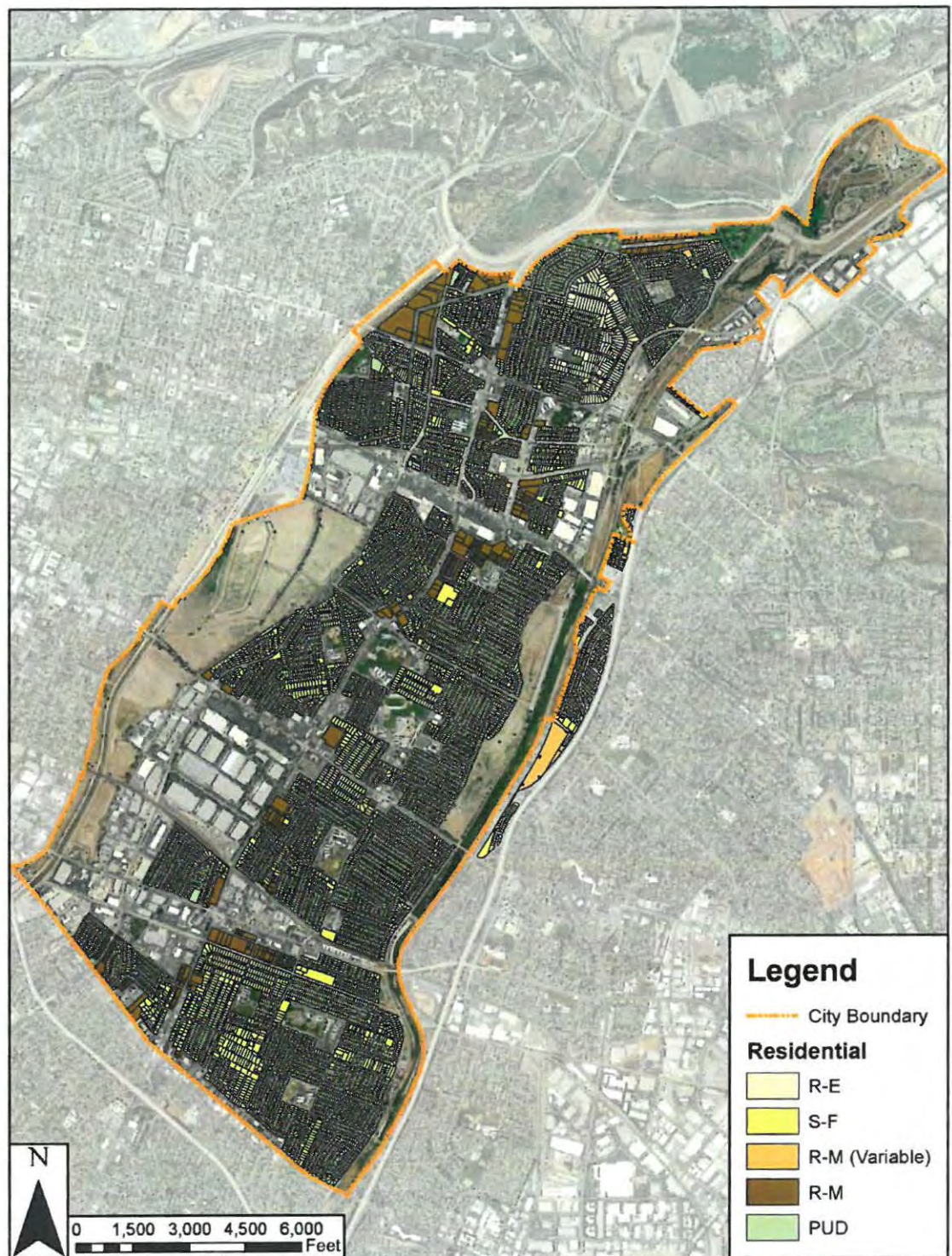


Figure 5 – Pico Rivera Nonvacant Residential and PUD Areas



**(e) Available Vacant Land**

**Table 7** demonstrates the available vacant land within the City across all zoning classifications. As shown, the City has approximately 32.7 acres of vacant land, only 2.24 of which is zoned within residential areas that are not within Planned Residential Unit Development (PUD) areas. The majority of this land is within Industrial Planned Development (IPD) areas that is not suitable for the development of residential uses. The majority of these parcels do not meet the size requirements for adequate sites within AB 1397.

**Table 7: City of Pico Rivera Vacant Lands Inventory**

| Zoning Classification                      | Size (Ac)    |
|--|--------------|
| Single-Family Residential (SF)             | 1.61         |
| Multiple-Family Residential (RM)           | 0.63         |
| General Commercial (CG)                    | 4.27         |
| Community Commercial(CC)                   | 0.54         |
| Commercial Manufacturing (CM)              | 0.60         |
| Light Industrial (IL)                      | 1.68         |
| Open Space (OS)                            | 0.04         |
| Public Facilities (PF)                     | 4.09         |
| Professional and Administrative (PA)       | 0.65         |
| Commercial Planned Development (CPD)       | 0.62         |
| Planned Residential Unit Development (PUD) | 3.25         |
| Industrial Planned Development (IPD)       | 14.72        |
| <b>Total</b>                               | <b>32.70</b> |

**(f) Comparison of Densities Versus RHNA Growth Allocation**

As described in **Table 8**, the City must transition up to 131 acres of existing developed high value land to accommodate future growth need. Therefore, the City must demonstrate that the opportunity exists to develop the required 3,939 units on infill properties over the 8-year planning period. It is unreasonable to assume the City will be able to justify this extent of sites, pursuant to the analysis required under AB 1397 and given the amount of available vacant land as demonstrated in section 3(e).

**Table 8: Comparison of Densities Versus RHNA Growth Allocation**

| Density Range           | RHNA Allocation | Acreage Needed to Accommodate Growth |
|-------------------------|-----------------|--------------------------------------|
| 30 Dwelling Units/Acre  | 3,939 units     | 131.3 acres                          |
| 60 Dwelling Units/Acre  | 3,939 units     | 65.7 acres                           |
| 100 Dwelling Units/Acre | 3,939 units     | 39.4 acres                           |

|          |                              |  |
|----------|------------------------------|--|
| <b>4</b> | <b>Changed Circumstances</b> | A significant and unforeseen change in circumstances has occurred in the local jurisdiction or jurisdictions that merits a revision of the information submitted pursuant to Section 65584. 04(b). |
|----------|------------------------------|--|

## City of Pico Rivera

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**(A) The novel coronavirus (COVID-19) presents an unforeseen changed circumstance that has severely impacted the City's financial status and impacted the development capacity of the private market to create housing within Pico Rivera.**

On March 4, 2020, the Los Angeles County Board of Supervisors and the Department of Public Health, which acts as the City of Pico Rivera's de facto Healthy agency, declared a local and public health emergency in response to the spread of the novel Coronavirus (COVID-19) within Los Angeles County. On the same day, California Governor Gavin Newsom declared a state of emergency in the State of California due to COVID-19's public health threat.

The relative impacts of COVID-19 on the existing and future housing needs within Pico Rivera are not known at this time, but it may influence short-term and long-term housing policy and program considerations within the community. The City acknowledges the substantial impact that this pandemic has had and will continue to have on the local economy, the ability to develop housing within Pico Rivera, and the City's financial ability to assist in lower income housing production.

Per July 2020 research completed by the Pew Research Center<sup>3</sup> found that around one-in-ten adults ages 18 to 29 (9%) say they moved (either permanently or temporarily) due to the coronavirus outbreak. This was due in part to job losses and the shutdown of college housing.

Additionally, data from Zillow<sup>4</sup> made the following findings related to local housing trends:

- More than 32 million adults lived with a parent or grandparent as of April, up 9.7% from the same period a year ago and the highest level on record.
- More than 80% of those who recently moved back in with their parents are Gen Zers who pay an estimated \$726 million in rent each month. Those payments, about 1.4% of the total rental market, could be at risk if moves home become permanent.
- The same study identified that the Los Angeles rental market may stand to lose up to 0.9% of the total rental market in lost rent.

Lastly, a joint UCLA-USC Report<sup>5</sup> found that:

- About 16% of tenants report paying rent late each month from April through July.
- About 10% did not pay rent in full for at least one month between May and July.
- About 2% of renters are three full months behind on rent. This translates to almost 40,000 households in a deep financial hole.
- Late payment and nonpayment are strongly associated with very low incomes (households earning less than \$25,000 annually) and being Black or Hispanic.
- This crisis is particularly acute in the Los Angeles region and other high-cost cities, where an existing affordable housing crisis and an economic slowdown resulting from mitigation efforts to curb the pandemic intersect to threaten the stability of many households.

While the long-term impacts of COVID-19 on local and regional housing trends is unknown, it is clear that a larger than normal segment of the population is leaving their housing situation to join with another household or is unable to make rent payments due to financial hardships. As the region continues to

<sup>3</sup> <https://www.pewresearch.org/fact-tank/2020/07/06/about-a-fifth-of-u-s-adults-moved-due-to-covid-19-or-know-someone-who-did/>

<sup>4</sup> <https://www.zillow.com/research/coronavirus-adults-moving-home-27271/>

<sup>5</sup> <https://news.usc.edu/175065/los-angeles-tenants-covid-19-pandemic-rent-usc-study/>



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battle with controlling the spread of COVID-19, the continued economic hardships presented by the virus on homeowners, renters, cities, and developers will likely lead to a decreased demand for housing and a higher percentage of co-habiting households.

**Conclusion**

Due in part to the COVID-19 pandemic, the state of California is experiencing population growth rates at historically low levels. Recent downward revisions by the Department of Finance illustrates the rate of population growth rate throughout California is slowly and a faster rate anticipated. In the last three years, the state has experienced the lowest population growth rates on record since 1900. Population growth is directly tied to household formation. The flattening of the population growth curve is contrary to the rate of growth identified in the Final Draft RHNA allocation. Furthermore, according to Freddie Mac’s February 2020 report, “The Housing Supply Shortage: State of the States,” their research indicates that “...California has a shortage of 820,000 housing units. But history suggests that California’s shortage may be overestimated if interstate migration is considered.”<sup>6</sup>

COVID-19 presents an unforeseen circumstance which will likely result in Pico Rivera and the State of California as a whole drastically and incorrectly reshaping the housing landscape in an effort to meet RHNA needs as opposed to organically in response to market trends. The impacts to the economy of the City and consequently to the housing market are profound and should be a consideration when evaluating realistic development potential over the 8-year RHNA planning period.

**CONCLUSION**

If the City developed at a pace consistent with the Connect SoCal Plan, the City would be on target to produce **524 units** for the 6<sup>th</sup> RHNA Cycle 2021-2029, at a rate of **65.5 units** per year. However, the City believes that a feasible growth rate of **86 units** per year can be achieved, and is consistent with the water supply assessment documented in its Urban Water Management Plan (UWMP) 2015-2040. This would achieve a growth of **688 units** for the same 8-year period. Without enough water, the City cannot physically achieve to produce the RHNA allocated amount of 3,939 units for the 6<sup>th</sup> Cycle. Therefore, the City has determined that a total equitable RHNA allocation is based on the following reductions in the current draft allocations:

| <b>Government Code Requirements</b>   | <b>Requested RHNA Reduction</b> |
|---|---------------------------------|
| <b>Section 65584(d)(1)</b> - <i>Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households.</i>  |                                 |
| <b>Reason</b> - The Draft RHNA allocation undermines this objective as it does not assign housing unit growth need in an equitable manner. The allocation is a marked increase in allocations from prior RHNA planning cycles and a disproportionately higher amount of lower income need to the community, based upon a flawed methodology that is inconsistent with regional growth forecasts at the regional, state and federal level. | -3,251                          |
| <b>Total</b>  | <b>-3,251</b>                   |

<sup>6</sup> Freddie Mac, “The Housing Supply Shortage: State of the States” February 2020, Page 6.

**City of Pico Rivera**  
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The table below summarizes the City of Pico Rivera’s recommended RHNA allocation by income category: The recommended 6th Cycle RHNA allocations acknowledges the need to accommodate future growth in the City, pursuant to consistently applied regional growth forecasts.

| <b>Income Category</b> | <b>Draft SCAG RHNA Allocation</b> | <b>Pico Rivera Recommended RHNA Allocation</b> |
|------------------------|-----------------------------------|--|
| Very Low               | 1,148 Units (29%)                 | 200 Units (29%)                                |
| Low                    | 562 Units (14%)                   | 96 Units (14%)                                 |
| Moderate               | 572 Units (15%)                   | 103 Units (15%)                                |
| Above Moderate         | 1,657 Units (42%)                 | 289 Units (42%)                                |
| <b>TOTAL</b>           | <b>3,939 Units</b>                | <b>688 Units</b>                               |



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**Community and Economic Development Director**  
**City of Pico Rivera**

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

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December 10, 2020

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

Dear Executive Director Ajise:

**RE: Comment on Appeals of the Draft Regional Housing Need Allocation (RHNA) Plan**

Thank you for the opportunity to comment on the 52 appeals Southern California Association of Governments (SCAG) has received regarding the draft RHNA plan. The appeal process is an important phase in the development of a RHNA plan that ensures that all relevant factors and circumstances are considered.

The only circumstances under which a jurisdiction can appeal are:

- 65584.05(b)(1): The council of governments failed to adequately consider the information regarding the factors listed in subdivision (e) of section 65584.04.
- 65584.05(b)(2): The council of governments failed to determine the share of the regional housing need in a manner that furthers the intent of the objectives listed in subdivision (d) of section 65584.
- 65584.05(b)(3): A significant unforeseen change in circumstances occurred in the local jurisdiction that merits a revision of the information submitted pursuant to subdivision (e) of Section 65584.04.

The California Department of Housing and Community Development (HCD) urges SCAG to only consider appeals that meet these criteria.

Per Government Code section 65584.05(e)(1), SCAG's final determination on whether to accept, reject, or modify any appeal must be accompanied by written findings, including how the final determination is based upon the adopted RHNA allocation methodology, and how any revisions are necessary to further the statutory objectives of RHNA described in Government Code section 65584(d).

Among the appeals based on Government Code section 65584.05(b)(1), several appeals state that SCAG failed to consider the factor described in Government Code section 65584.04(e)(2)(B), citing the lack of land suitable for development as a basis for the appeal. However, this section states the council of governments may not limit its consideration of suitable housing sites to existing zoning and land use restrictions and must consider the potential for increased development under alternative zoning and

land use restrictions. Any comparable data or documentation supporting this appeal should contain an analysis of not only land suitable for urban development, but land for conversion to residential use, the availability of underutilized land, and opportunity for infill development and increased residential densities. In simple terms, this means housing planning cannot be limited to vacant land, and even communities that view themselves as built out must plan for housing through means such as rezoning commercial areas as mixed-use areas and upzoning non-vacant land.

With regard to appeals submitted related to Government Code section 65584.05(b)(2), that SCAG failed to determine the RHNA in a manner that furthers the statutory objectives, it should be noted that HCD reviewed SCAG's draft allocation methodology and found that the draft RHNA allocation methodology furthered the statutory objectives described in Government Code section 65584.

Among the appeals based on Government Code section 65584.05(b)(2), several contend that the cap on units allocated to extremely disadvantaged communities (DACs) does not further RHNA's statutory objectives. This cap furthers the statutory objective to affirmatively further fair housing by allocating more units to high opportunity areas and fewer units to low resource communities, and concentrated areas of poverty with high levels of segregation. Due to the inclusion of this factor, as well as the use of TCAC/HCD Opportunity Maps, SCAG's methodology allocates 14 of the top 15 highest shares of lower-income RHNA to jurisdictions with over 99.95 percent High and Highest Resource areas. With the exceptions of two jurisdictions, the 31 jurisdictions with the highest share of lower-income RHNA are all over 95 percent High and Highest Resource areas. Any weakening of these inputs to the methodology could risk not fulfilling the statutory objective to affirmatively further fair housing.

Several appeals argue that SCAG's RHNA allocation methodology does not adequately promote access to jobs and transit, as required in objectives two and three. HCD's review of SCAG's RHNA methodology found the allocation does further the environmental principles of objective two. SCAG's overall allocation includes significant weight related to the location of high-quality transit areas and the regional distribution of jobs that can be accessed within a 30-minute driving commutes. Regarding objective three, HCD's analysis as to whether jobs-housing fit was furthered by SCAG's draft methodology found that across all jurisdictions there is generally good alignment between low-wage jobs and lower-income RHNA, with all but 15 jurisdictions within a half percent plus or minus difference between their share of lower-income RHNA for the region and their percentage low-wage jobs for the region.

Several appeals are based upon the provision described in Government Code section 65584.05(b)(3), arguing that the COVID-19 pandemic represents a significant and unforeseen change in circumstances that will affect future population and job growth. Ensuring everyone has a home is critical to public health. Reducing and preventing overcrowding and homelessness are essential concerns for every community. The COVID-19 pandemic has only increased the importance that each community is planning for sufficient affordable housing.

Lastly, several appeals state that the Regional Housing Needs Determination (RHND) HCD provided to the SCAG region is too large. SCAG submitted an objection to the RHND at the appropriate time and through the appropriate process. HCD considered those objections and [determined the final RHND for 6<sup>th</sup> Housing Element Cycle for the SCAG region on October 15, 2019](#). There are no further appeal procedures available to alter the SCAG region's RHND for this cycle. Government Code section 65584.05(b) does not allow local governments to appeal the RHND during the 45-day period following receipt of the draft allocation.

HCD acknowledges that many local governments will need to plan for more housing than in the prior cycle to accommodate a RHND that more fully captures the housing need and as the statutory objectives of RHNA shift more housing planning near jobs, transit, and resources. The Southern California region's housing crisis requires each jurisdiction to plan for the housing needs of their community and the region. In recognition of this effort there are more resources available than ever before to support jurisdictions as they prepare to update their 6<sup>th</sup> cycle housing elements:

- SB 2 Planning Grants – \$123 million one-time allocation to cities and counties
- SB 2 Planning Grants Technical Assistance offered to all jurisdictions
- Regional and Local Early Action Planning Grants – \$238 million one-time allocation for local and regional governments
- SB 2 Permanent Local Housing Allocation – approximately \$175 million annually in ongoing funding for local governments to increase affordable housing stock

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Megan Kirkeby, Deputy Director, [megan.kirkeby@hcd.ca.gov](mailto:megan.kirkeby@hcd.ca.gov).



Megan Kirkeby  
Deputy Director



# City of Whittier

13230 Penn Street, Whittier, California 90602-1716  
(562) 567-9320 Fax (562) 567-2872 www.cityofwhittier.org

Electronically Transmitted to: [Housing@scag.ca.gov](mailto:Housing@scag.ca.gov)

December 10, 2020

RHNA Appeals Committee  
Southern California Association of Governments  
900 Wilshire Blvd, Suite 1700  
Los Angeles, CA 90017

**SUBJECT: City of Whittier's Comments on Appeals to the Sixth Cycle Regional Housing Needs Assessment (RHNA) Allocation**

Honorable Chair and Honorable Committee Members:

The City of Whittier ("City") appreciates the challenges that are inherent in allocating 1,341,827 housing units by the thousands (a 226% increase above the baseline 412,137 unit) to cities across Southern California, especially in built-out cities. However, the City is deeply concerned its housing allocation of 3,431 units from the State Department of Housing and Community Development ("HCD") and the Southern California Association of Government's ("SCAG") unit distribution methodology, along with recent housing legislation will fundamentally abridge the City's ability to develop effective land-use policies that are appropriate for managing the community's actual needs. The 878 units in the 5<sup>th</sup> cycle RHNA allocation has been increased by 290% to 3,431 units in the current 6<sup>th</sup> cycle. Particularly challenging in the 6<sup>th</sup> cycle, is the number of low and very low-income units (1,558) which combined with the moderate and above moderate unit totals forces unplanned and unnecessary residential densification of the community.

The affordable units are an unfunded mandate with very limited regional or State financial support for their development. Considering the affordable housing subsidies typically range from \$50,000 to \$250,000 per unit, the overall funding requirements could range from \$78,000,000 to \$390,000,000 which is clearly beyond the reach of the City of Whittier in that the City's general fund budget is just \$72,000,000 which already include \$2,000,000 annually to house the City's unsheltered residents in transitional housing. Additionally, the City only receives 7.5% of each property tax dollar to provide general services including police and library services.

The City is currently in the process of updating its Housing Element as well as the General Plan to incorporate the current RHNA allocation, so Whittier is acutely aware of the various housing needs as well as the potential obstacles, such as aging infrastructure and unplanned density, to creating the requisite housing within a city that

is essentially built out. The changes in the State's housing laws (SB 35, SB 166 and AB 1397) have created additional constraints for the agencies and may severely impact the City's ability to accomplish our regional and local housing goals.

Since development in Whittier began more than 130 years ago, the City is virtually built-out with little developable vacant land outside of its designated open space areas that are dedicated to accommodating existing and future residents. While the City has made significant efforts through its specific plans to densify existing corridors and districts, the majority of Whittier's remaining single-family residential neighborhoods cannot accommodate similar densification. Furthermore, the hills north of Whittier contain regional open space, sensitive habitat and wildlife areas that must be preserved in perpetuity. There are also significant infrastructure and water service constraints that impact Whittier's ability to produce significantly more housing. Although these facts may not be desirable, they must be pragmatically accounted for and mitigated by not further increasing Whittier's share of housing units contained in SCAG's 6<sup>th</sup> Cycle RHNA. The final RHNA allocation and methodology must be fair and equitable while reflecting the capacity for reasonable housing unit construction.

As with many other cities, the City is concerned about the current allocation, but an even greater concern is that additional units may be applied to the City if reallocated from cities that are successful in their appeals. To that end, the City believes the appeal process itself was unclear as to the potential ramifications to other cities and not fully understood.

Although we fully support the surrounding cities in their appeals, the potential for additional units being applied to the City would exacerbate the problems described herein and in Whittier's September 13, 2019 letter to SCAG.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Jeffery S. Adams  
Director of Community Development

File

**From:** Christopher Koontz <Christopher.Koontz@longbeach.gov>  
**Sent:** Thursday, December 3, 2020 11:14 AM  
**To:** Regional Housing  
**Subject:** RHNA Appeals

**Categories:** Response Required, Record

Good morning,

The purpose of this email is to provide the City of Long Beach's position in regards to pending RHNA appeals before SCAG. The City of Long Beach seeks to meet its housing needs and obligations for the benefit of Long Beach residents and the region. Our allocation was extremely large and presents a planning and financing challenge for the City. Nonetheless we chose not to appeal our allocation because the allocation process was fair and transparent including taking the City of Long Beach's input into consideration.

We oppose and will not accept any transfer of additional allocation due to the pending appeals. We note that within our area, the Gateway COG, appeals are pending from Bellflower, Cerritos, Downey, Huntington Park, La Mirada, Lakewood, Pico Rivera, and South Gate. Each of these appeals should be evaluated by SCAG on the merits, however Long Beach opposes any transfer of allocation to our City. It would be inappropriate to transfer a further burden to Long Beach when we have already accepted a large allocation and have done more than many cities in the region to accommodate housing growth under the current RHNA cycle, including fully meeting our market-rate RHNA allocation.

The City of Long Beach will continue to work with SCAG and our neighbor jurisdictions to address the housing needs of our residents.

We thank you for consideration and please do not hesitate to contact the City regarding our position.

Christopher Koontz, AICP  
*Deputy Director*

Development Services  
411 W. Ocean Blvd., 3rd Floor | Long Beach, CA 90802  
Office: 562.570.6288 | Fax: 562.570.6068



Attachment: Comments Received During the Comment Period (General) (Appeal of the Draft RHNA Allocation for the City of Pico Rivera)





Southern California Association of Governments  
Remote Participation Only  
January 8, 2021

To: Regional Housing Needs Assessment Subcommittee (RHNA)

EXECUTIVE DIRECTOR'S  
APPROVAL

From: Karen Calderon, Associate Regional Planner,  
(213) 236-1983, calderon@scag.ca.gov

Subject: Appeal of the Draft RHNA Allocation for the City of Lakewood

**RECOMMENDED ACTION:**

Deny the appeal filed by the City of Lakewood (City) to reduce the Draft RHNA Allocation for the City by 1,414 units.

**STRATEGIC PLAN:**

This item supports the following Strategic Plan Goal 2: Advance Southern California’s policy interests and planning priorities through regional, statewide, and national engagement and advocacy.

**SUMMARY OF APPEAL:**

The City of Lakewood requests a reduction of its RHNA allocation by 1,414 units (from 3,914 units to 2,500 units) based on the following issues:

1. Availability of land suitable for urban development or for conversion to residential use - the City is already densely populated and build-out and their allocation would have an adverse impact on the City’s employment and public services.
2. Changed circumstances - COVID-19 transmission and requests SCAG object to the regional determination due to the changed circumstances brought about by the pandemic.

**RATIONALE FOR STAFF RECOMMENDATION:**

Staff have reviewed the appeal and recommend no change to the City of Lakewood’s RHNA allocation. Issue 1 was not demonstrated to be an impediment to meeting Lakewood’s RHNA allocation since it does not consider the possibility of allowing housing on other non-vacant land in the city. Based on Issue 2, it was not demonstrated that increased density would result in public health concerns related to COVID-19. Additionally, the regional determination is not a basis for appeal per adopted RHNA Appeals Procedures as it is not within the authority of the Appeals Board to make changes.

**OUR MISSION**

*To foster innovative regional solutions that improve the lives of Southern Californians through inclusive collaboration, visionary planning, regional advocacy, information sharing, and promoting best practices.*

**OUR VISION**

*Southern California’s Catalyst for a Brighter Future*

**OUR CORE VALUES**

*Be Open | Lead by Example | Make an Impact | Be Courageous*

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**BACKGROUND:****Draft RHNA Allocation**

Following the adoption of the Final RHNA Methodology on March 5, 2020 and the adoption of Connect SoCal on September 3, 2020, all local jurisdictions received Draft RHNA Allocations on September 11, 2020. A summary is below.

**Total RHNA for the City of Lakewood: 3,914 units**

Very Low Income: 1,293 units

Low Income: 636 units

Moderate Income: 652 units

Above Moderate Income: 1,333 units

Additional background related to the Draft RHNA Allocation is included in Attachment 1.

**Summary of Comments Received during 45-day Comment Period**

No comments were received from local jurisdictions or HCD during the 45-day public comment period described in Government Code section 65584.05(c) which specifically regard the appeal filed for the City of Lakewood. Three comments were received which relate to appeals filed generally:

- HCD submitted a comment on December 10, 2020 delineating the statutory basis for RHNA appeals and the requirement that any appeals granted must include written findings regarding how revisions are necessary to further RHNA's statutory objectives.
- The City of Whittier submitted a comment on December 10, 2020 supporting surrounding cities in their appeals but expressing concern that additional units may be applied to Whittier if reallocated from cities which are successful in their appeals.
- The City of Long Beach submitted a comment on December 3, 2020 indicating their view that the RHNA allocation process was fair and transparent, their support for evaluating appeals on their merits (specifically those from the Gateway Council of Governments), and their opposition to any action which would result in a transfer of additional units to Long Beach.

**ANALYSIS:**

**Issue 1: Availability of land suitable for urban development or for conversion to residential use [Government Code Section 65584.04(e)(2)(B)].**

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*The City argues Lakewood is a densely populated, build-out residential community. Of the few available lots identified in the City's Housing Element, many are being developed for housing or are close to Long Beach Airport, which imposes restrictions on residential use. The proposed allocation of units would force the City to designate the already small percentage of non-residential land uses (7.67%) to future residential development, which would negatively impact employment in the City. Additionally, Lakewood's population density is greater than both the City and County of Los Angeles, which leaves a high burden on its infrastructure and roads, open space, schools, and other services.*

**SCAG Staff Response:** Pursuant to Government Code Section 65584.04(e)(2)(B), SCAG “may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality” (which includes the land use policies in its General Plan). ‘Available land suitable for urban development or conversion to residential use,’ as expressed in 65584.04(e)(2)(b), is not restricted to vacant sites; rather, it specifically indicates that underutilized land, opportunities for infill development, and increased residential densities are a component of ‘available’ land. As indicated by HCD in its December 10, 2020 comment letter (HCD Letter):

“In simple terms, this means housing planning cannot be limited to vacant land, and even communities that view themselves as built out must plan for housing through means such as rezoning commercial areas as mixed-use areas and upzoning non-vacant land.” (HCD Letter at p. 2).

As such, the City can consider other opportunities for development. This includes the availability of underutilized land, opportunities for infill development and increased residential densities, or alternative zoning and density. Alternative development opportunities should be explored further and could possibly provide the land needed to zone for the City's projected growth.

Indeed, AB1397, reiterates this concept and sets forth housing element site inventories which specifically include nonvacant sites. On June 10, 2020, HCD released extensive guidelines for housing element site inventories which takes into account AB 1397's changes<sup>1</sup>. A wide range of adequate sites are detailed including accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs). Specifically, the guidelines indicate that (page 32):

“In consultation with HCD, other alternatives may be considered such as motel conversions, adaptive reuse of existing buildings, or legalization of units not previously reported to the Department of Finance.”

Note that while zoning and capacity analysis is used to meet RHNA need, they should not be used to determine RHNA need at the jurisdictional level. Per the adopted RHNA methodology, RHNA need

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<sup>1</sup> See [https://www.hcd.ca.gov/community-development/housing-element/docs/sites\\_inventory\\_memo\\_final06102020.pdf](https://www.hcd.ca.gov/community-development/housing-element/docs/sites_inventory_memo_final06102020.pdf)

at the jurisdictional level is determined by projected household growth, transit access, and job access. Housing need, both existing and projected need, is independent of zoning and other related land use restrictions, and in some cases is exacerbated by these very same restrictions. Thus, land use capacity that is restricted by factors unrelated to existing or projected housing need cannot determine existing or projected housing need. While SCAG understands it is a challenge for jurisdictions to provide the appropriate infrastructure, roads, open space, schools, and other public services, that does not preclude the jurisdiction from planning and zoning for its existing and projected housing need.

***Issue 2: Changed Circumstances [Government Code 65584.05(b)].***

*The recent Covid-19 pandemic has added an unforeseen challenge in meeting the City's housing goals. The drastic change in circumstance should justify pausing the process to consider the long-term implications of pushing for the dramatic increase in housing production. The greater density overall can lead to a greater possibility of COVID-19 transmission. Given recent concerns over compromised public health and safety, dramatic increases in housing density should be re-analyzed.*

**SCAG Staff Response:** SCAG recognizes that COVID-19 presents unforeseen circumstances and that local governments have been affected by significant unemployment. However, these facts, as presented by the City, do not “merit a revision of the information submitted pursuant to subdivision (b) of Section 65584.04.” (Govt. Code § 65584.05(b)(3)). Furthermore, Section 65584.05(b) requires that:

“Appeals shall be based upon comparable data available for all affected jurisdictions and accepted planning methodology, and supported by adequate documentation, and shall include a statement as to why the revision is necessary to further the intent of the objectives listed in subdivision (d) of Section 65584.”

SCAG's Regional Council delayed the adoption of its 2020-2045 RTP/SCS by 120 days in order to assess the extent to which long-range forecasts of population, households, and employment may be impacted by COVID-19; however, the document's long-range (2045) forecast of population, employment, and household growth remained unchanged. The Demographics and Growth Forecast Technical Report<sup>2</sup> outlines the process for forecasting long-range employment growth which involves understanding national growth trends and regional competitiveness, i.e., the SCAG's region share of national jobs. Short-term economic forecasts commenting on COVID-19 impacts generally do not provide a basis for changes in the region's long-term competitiveness or the region's employment outlook for 2023-2045. As such, SCAG's assessment is that comparable data would not suggest long-range regional employment declines.

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<sup>2</sup> See [https://www.connectsocal.org/Documents/Adopted/0903fConnectSoCal\\_Demographics-And-Growth-Forecast.pdf](https://www.connectsocal.org/Documents/Adopted/0903fConnectSoCal_Demographics-And-Growth-Forecast.pdf)

The COVID-19 pandemic has had various impacts throughout Southern California; however, it has not resulted in a slowdown in major construction nor has it resulted in a decrease in a demand for housing or housing need. Southern California home prices continue to increase (+2.6 percent from August to September 2020) led by Los Angeles (+10.4 percent) and Ventura (+6.2 percent) counties. Demand for housing as quantified by the RHNA allocation is a need that covers an 8-year period, not simply for impacts that are in the immediate near-term. Moreover, impacts from COVID-19 are not unique to any single SCAG jurisdiction and no evidence has been provided in the appeal that indicates that housing need within jurisdiction is disproportionately impacted in comparison to the rest of the SCAG region. For these reasons, SCAG staff does not recommend a reduction to the jurisdiction's Draft RHNA Allocation.

Furthermore, while conditions such as overcrowding can be correlated to public health concerns, increased density is not a synonym for overcrowding. Overcrowding is defined as more than 1.01 persons per room in a housing unit and a jurisdiction can increase its density without resulting in overcrowded housing units. One of the objectives of increasing housing supply is to reduce overcrowding and ironically, planning for fewer housing units than needed may in fact result in overcrowding.

Additionally, while it is up to the individual jurisdiction to determine the optimal density to accommodate its housing need, provided that a residential unit meets all California Building Health and Safety Code requirements there is not a maximum density limit that would result in a need to reduce a RHNA allocation.

**Other.** *In addition to the issues addressed above which are the bases of an appeal, the City of Lakewood also notes that: The regional determination of 1.34 million housing units combined with the inequitable RHNA methodology, which does not include local input, are setting up local jurisdictions for failure to comply with state housing law, which would result in the non-certification of the City's Housing Element. The City requests SCAG consider objecting, once more, to the regional determination of 1.34 million housing units due to the changed circumstances brought about by the pandemic.*

**SCAG Staff Response:** As described above and in Attachment 1: Local Input and Development of Draft RHNA Allocation, the Final RHNA Methodology was adopted by the Regional Council on March 5, 2020 and describes the various policy factors whereby housing unit need is to be allocated across the region—for example, anticipated growth, access to jobs and transit, and vacancy. The methodology makes extensive use of locally-reviewed input data and describes data sources and how they are calculated in detail. On January 13, 2020, the RHNA methodology was found by HCD to further the five statutory objectives in large part due to its use of objective factors and as such cannot consider factors differently in one jurisdiction versus another. See Attachment 1, "Local Input and Development of Draft RHNA allocation" which describes the extent of local engagement

and review opportunities provided to local jurisdictions on the household growth forecast. Review opportunities began in October 2017. While the initial deadline for input was October 2018, additional review opportunities were provided to all local jurisdictions through June 2020.

SCAG and HCD understand the challenges jurisdiction's face to comply with state housing law. To assist in this effort, the City can make use of the various funding opportunities available to support jurisdictions updating their 6th cycle housing elements:

- SB 2 Planning Grants – \$123 million one-time allocation to cities and counties
- SB 2 Planning Grants Technical Assistance offered to all jurisdictions
- Regional and Local Early Action Planning Grants – \$238 million one-time allocation for local and regional governments
- SB 2 Permanent Local Housing Allocation – approximately \$175 million annually in ongoing funding for local governments to increase affordable housing stock (see attached Comment Letter from HCD dated December 10, 2020 at p.3).

Regarding the City's request for SCAG to object again to the regional determination, SCAG's final regional determination of approximately 1.34 million units was issued by HCD on October 15, 2019 per state housing law. State statute outlines a very specific process for arriving at a regional housing needs determination for RHNA. It also prescribes a specific timeline which necessitated the completion of the regional determination step by fall 2019 in order to allow sufficient time for the development of a methodology, appeals, and local housing element updates.

The regional determination is not a basis for appeal per adopted RHNA Appeals Procedures as it is not within the authority of the Appeals Board to make any changes to HCD's regional housing needs assessment. Only improper application of the methodology is grounds for an appeal. An example of an improper application of the adopted methodology might be a data error which was identified by a local jurisdiction.

While the RHNA statute prescribes specific requirements for HCD in determining the regional housing need (e.g., the determination shall be based on population projects produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans), it allows HCD to accept or reject information provided by SCAG with respect to the data assumptions from SCAG's growth forecast or to modify its own assumptions or methodology based on this information. HCD did not materially change the regional determination following SCAG's formal objection filed on September 18, 2019, and there are no further mechanisms provided for in statute to contest their decision. Nevertheless, SCAG has a statutory obligation to complete the remaining steps required in the RHNA process—namely the adoption of a final RHNA methodology, conducting an appeals process, and issuing final RHNA allocations.



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**FISCAL IMPACT:**

Work associated with this item is included in the current FY20-21 Overall Work Program (300-4872Y0.02: Regional Housing Needs Assessment).

**ATTACHMENT(S):**

1. Local Input and Development of Draft RHNA Allocation (City of Lakewood)
2. Appeal Form and Supporting Documentation (City of Lakewood)
3. Comments Received During the Comment Period (General)

## **Attachment 1: Local Input and Development of Draft RHNA Allocation**

This attachment sets forth the nature and timing of the opportunities which the City of Lakewood had to provide information and local input on SCAG’s growth forecast, the RHNA methodology, and the Growth Vision of the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). It also describes how the RHNA Methodology development process integrates this information in order to develop the City of Lakewood’s Draft RHNA Allocation.

### **1. Local Input**

#### ***a. Bottom-Up Local Input and Envisioning Process***

On October 31, 2017, SCAG took the first step toward developing draft RHNA allocations by initiating the Bottom-Up Local Input and Envisioning Process. At the direction of the Regional Council, the objective of this process was to seek local input and data to prepare for Connect SoCal and the 6<sup>th</sup> cycle of RHNA.<sup>1</sup> Each jurisdiction was provided with a package of land use, transportation, environmental, and growth forecast data for review and revision which was due on October 1, 2018.<sup>2</sup> While the local input process materials focus principally on jurisdiction-level and Transportation Analysis Zone (TAZ) level growth, input on specific parcels, sites, and project areas were welcomed and integrated into SCAG’s growth forecast as well as data on other elements. SCAG met one-on-one with all 197 local jurisdictions between November 2017 and July 2018 and provided training opportunities and staff support. Following input from SCAG’s Technical Working Group (TWG), the Connect SoCal growth forecast reflected precisely the jurisdiction-level growth totals provided during this process.

The local input data included SCAG’s preliminary growth forecast information. For the City of Lakewood, the anticipated number of households in 2020 was 26,446 and in 2030 was 27,456 (growth of 1,010 households). In June 2018, SCAG staff met with local jurisdiction staff to discuss the Bottom-Up Local Input and Envisioning Process and answer questions. Input was not received. The preliminary figures above were used by SCAG.

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<sup>1</sup> While the RTP/SCS and RHNA share data elements, they are distinct processes. The RTP/SCS growth forecast provides an assessment of reasonably foreseeable future patterns of employment, population, and household growth in the region given demographic and economic trends, and existing local and regional policy priorities. The RHNA identifies anticipated housing need over a specified eight-year period and requires that local jurisdictions make available sufficient zoned capacity to accommodate this need. A further discussion of the relationship between these processes can be found in Connect SoCal Master Response 1 at: [https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal\\_Public-Participation-Appendix-2.pdf](https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal_Public-Participation-Appendix-2.pdf).

<sup>2</sup> A detailed list of data during this process reviewed can be found in each jurisdiction’s Draft Data/Map Book at <http://scagrtpscs.net/Pages/DataMapBooks.aspx>



### ***b. RHNA Methodology Surveys***

On March 19, 2019, SCAG distributed a packet of methodology surveys, which included the local planning factor survey (formerly known as the AB2158 factor survey), Affirmatively Furthering Fair Housing (AFFH) survey, and replacement need survey, to SCAG jurisdictions' Community Development Directors. Surveys were due on April 30, 2019. SCAG reviewed all submitted responses as part of the development of the draft RHNA methodology. The City of Lakewood submitted the following surveys prior to the adoption of the draft RHNA methodology:

- Local planning factor survey
- Affirmatively Furthering Fair Housing (AFFH) survey
- Replacement need survey
- No survey was submitted to SCAG

### ***c. Connect SoCal Growth Vision and Additional Refinements***

Beginning in May 2018, SCAG's Sustainable Communities Working Group began the process of developing growth scenarios for the SCAG region. The culmination of this work was the development of the Connect SoCal Growth Vision, which directly uses jurisdictional-level growth projections from the Bottom-Up Local Input and Envisioning process, and also features strategies for growth at the TAZ-level that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Additional detail regarding the Connect SoCal Growth Vision, specifically the Transportation Analysis Zone (TAZ, or neighborhood) level projections is found at <https://www.connectsocal.org/Documents/DataMapBooks/Growth-Vision-Methodology.pdf>.

As a result of these strategies, in some jurisdictions growth at the TAZ-level differed from locally anticipated growth conveyed during the Bottom-Up Local Input and Envisioning Process.

As such, SCAG provided two additional opportunities for all local jurisdictions to make TAZ-level technical refinements on the topics of general plan capacities and entitlements. During the release of the draft Connect SoCal Plan, jurisdictions were notified on October 31, 2019 that SCAG would accept additional refinements until December 11, 2019. Following the Regional Council's decision to delay full adoption of Connect SoCal for 120 days due to the COVID-19 pandemic, all jurisdictions were again notified on May 26, 2020 that SCAG would accept additional refinements until June 9, 2020.

Connect SoCal Growth Vision data have been available to local jurisdiction staff during the entirety of this process through SCAG's Scenario Planning Model Data Management Site (SPM-DM) at <http://spmddm.scag.ca.gov> and updates were shared with local jurisdictions on technical refinements to the data in February 2020 and August 2020 to share the results of both review opportunities. SCAG received additional technical corrections from the City of Lakewood and incorporated them into the

Growth Vision. The City of Lakewood’s TAZ-level data utilized in the Connect SoCal Growth Vision matches input provided during the Bottom-Up Local Input and Envisioning Process.

**2. Development of the Final RHNA Methodology**

SCAG convened the first meeting of the RHNA Subcommittee in October 2018. In their subsequent monthly meetings, this body reviewed and advised on the development of SCAG’s 6<sup>th</sup> cycle RHNA process, including the development of the RHNA methodology. Per Government Code 65584.04(a), SCAG must develop a RHNA methodology which furthers the five statutory objectives of RHNA:

*(1) Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households.*

*(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region’s greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.*

*(3) Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.*

*(4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.*

*(5) Affirmatively furthering fair housing (Govt. Code § 65584(d)).*

As explained in more detail below, the Draft RHNA Methodology (which was adopted as the Final RHNA Methodology) set forth the policy factors, data sources, and calculations which would be used to generate draft RHNA allocations for all local jurisdictions. Following extensive debate and public comment, SCAG’s Regional Council voted to approve the Draft RHNA Methodology on November 7, 2019 and provide it to HCD for review. Per Government Code 65584.04(i), HCD is vested with the authority to determine whether a methodology furthers the objectives set forth in Government Code section 65584(d). On January 13, 2020, HCD found that the Draft RHNA Methodology furthers these five statutory objectives of RHNA. Specifically, HCD noted that:

*“This methodology generally distributes more RHNA, particularly lower income RHNA, near jobs, transit, and resources linked to long term improvements of life outcomes.*

*In particular, HCD applauds the use of the objective factors specifically linked the statutory objectives in the existing need methodology.” (Letter from HCD to SCAG dated January 13, 2020 at <https://scag.ca.gov/sites/main/files/file-attachments/hcd-review-rc-approved-draft-rhna-methodology.pdf?1602190239>).*

On March 5, 2020, again following extensive debate and public comment, the Regional Council voted to approve the Draft RHNA Methodology as the Final RHNA Methodology. Unlike SCAG’s 5<sup>th</sup> cycle RHNA methodology which relies almost entirely on the household growth component of the RTP/SCS, SCAG’s 6<sup>th</sup> cycle RHNA methodology consists of two primary elements: “projected need” which includes the number of housing units required to accommodate anticipated population growth over the 8-year RHNA planning period and “existing need,” which refers to the number of housing units required to accommodate excess or unsatisfied housing demand experienced by the region’s current population.<sup>3</sup> Furthermore, the Final RHNA methodology utilizes measures of 2045 job accessibility and High Quality Transit Area (HQT) population measures based on TAZ-level projections in the Connect SoCal Growth Vision.

More specifically, the Final RHNA Methodology considers three primary factors in determining a local jurisdiction’s total housing need which are primarily based on data from Connect SoCal’s aforementioned Bottom-Up Local Input and Envisioning Process:

- Forecasted growth over 2020-2030 (projected need)
- Transit accessibility in 2045 (existing need)
- Job accessibility in 2045 (existing need)

The methodology is described in further detail at:

<http://scag.ca.gov/programs/Documents/RHNA/SCAG-Final-RHNA-Methodology-030520.pdf>.

### 3. Draft RHNA Allocation for the City of Lakewood

Following the adoption of the Final RHNA Methodology on March 5, 2020 and the 120 day delay due to the COVID-19 pandemic, SCAG adopted Connect SoCal on September 3, 2020, and the City of Lakewood received its draft RHNA allocation on September 11, 2020. Application of the RHNA methodology yields the draft RHNA allocation for the City of Lakewood as summarized in the data and calculations in the tables below.

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<sup>3</sup> Legislative changes in 2018 modified the nature of the regional housing need determination for the 6<sup>th</sup> cycle of RHNA by adding measures of household overcrowding and housing cost burden to the list of factors to be considered by HCD for the determination of housing need. These new measures are not included in the Connect SoCal Growth Forecast because they are not direct inputs to the growth forecasting process and are independent of employment and population projections. In contrast, they reflect additional latent housing needs in the current population (i.e. “existing need”) and would not result in a change in regional population. For further discussion see Connect SoCal Master Response 1 at [https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal\\_Public-Participation-Appendix-2.pdf](https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal_Public-Participation-Appendix-2.pdf).

| <b>Lakewood city statistics and inputs:</b>  |           |
|--|-----------|
| Forecasted household (HH) growth, RHNA period:<br><i>(2020-2030 Household Growth * 0.825)</i>  | 833       |
| Percent of households who are renting:   | 29%       |
| Housing unit loss from demolition (2009-18):   | -         |
| Adjusted forecasted household growth, 2020-2045:<br><i>(Local input growth forecast total adjusted by the difference between the RHNA determination and SCAG's regional 2020-2045 forecast, +4%)</i> | 2,355     |
| Percent of regional jobs accessible in 30 mins (2045):<br><i>(For the jurisdiction's median TAZ)</i>   | 19.85%    |
| Jobs accessible from the jurisdiction's median TAZ (2045):<br><i>(Based on Connect SoCal's 2045 regional forecast of 10.049M jobs)</i>   | 1,995,000 |
| Share of region's job accessibility (population weighted):   | 0.62%     |
| Jurisdiction's HQTAs population (2045):  | 5,389     |
| Share of region's HQTAs population (2045):   | 0.05%     |
| Share of population in low/very low-resource tracts:   | 0.01%     |
| Share of population in very high-resource tracts:  | 12.29%    |
| Social equity adjustment:  | 150%      |

| <b>Calculation of Draft RHNA Allocation for Lakewood city</b>   |             |
|---|-------------|
| Forecasted household (HH) growth, RHNA period:  | 833         |
| Vacancy Adjustment<br><i>(5% for renter households and 1.5% for owner households)</i>   | 21          |
| Replacement Need  | -           |
| <b>TOTAL PROJECTED NEED:</b>  | <b>854</b>  |
| Existing need due to job accessibility (50%)  | 2575        |
| Existing need due to HQTAs pop. share (50%)   | 220         |
| Net residual factor for existing need<br><i>(Negative values reflect a cap on lower-resourced community with good job and/or transit access. Positive values represent this amount being redistributed to higher-resourced communities based on their job and/or transit access.)</i> | 264         |
| <b>TOTAL EXISTING NEED</b>  | <b>3060</b> |
| <b>TOTAL RHNA FOR LAKEWOOD CITY</b>   | <b>3914</b> |
| Very-low income (<50% of AMI)   | 1293        |
| Low income (50-80% of AMI)  | 636         |
| Moderate income (80-120% of AMI)  | 652         |
| Above moderate income (>120% of AMI)  | 1333        |

The transit accessibility measure is based on the population anticipated to live in High-Quality Transit Areas (HQTAs) in 2045 based on Connect SoCal’s designation of high-quality transit areas and population forecasts. With a forecasted 2045 population of 5,388 living within HQTAs, the City of Lakewood represents 0.05% of the SCAG region’s HQTA population, which is the basis for allocating housing units based on transit accessibility.

Job accessibility is defined as the jurisdiction’s share of regional jobs accessible within a 30-minute drive commute. Since over 80 percent of the region’s workers live and work in different jurisdictions,

the RHNA methodology uses a measure based on Connect SoCal’s travel demand model output for the year 2045 rather than assigning housing units based on the number of jobs with a specific jurisdiction. Specifically, the share of future (2045) regional jobs which can be reached in a 30-minute automobile commute from the local jurisdiction’s median TAZ is used as to allocate housing units based on transit accessibility. From the City of Lakewood’s median TAZ, it will be possible to reach 19.85% of the region’s jobs in 2045 within a 30-minute automobile commute (1,995,000 jobs, based on Connect SoCal’s 2045 regional job forecast of 10,049,000 jobs).

An additional factor is included in the methodology to account for RHNA Objective #5 to Affirmatively Further Fair Housing (AFFH). Several jurisdictions in the region which are considered disadvantaged communities (DACs) on the basis of access to opportunity measures (described further in the RHNA methodology document), but which also score highly in job and transit access, may have their total RHNA allocations capped based on their long-range (2045) household forecast. This additional housing need, referred to as residual, is then reallocated to non-DAC jurisdictions in order to ensure housing units are placed in higher-resourced communities consistent with AFFH principles. This reallocation is based on the job and transit access measures described above, and results in an additional 264 units assigned to the City of Lakewood.

Please note that the above represents only a partial description of key data and calculations in the RHNA methodology.

**Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form**  
*All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.*  
*Appeals and supporting documentation should be submitted to [housing@scaq.ca.gov](mailto:housing@scaq.ca.gov).*  
*Late submissions will not be accepted.*

Date: \_\_\_\_\_ Jurisdiction Subject to This Appeal Filing: \_\_\_\_\_  
 \_\_\_\_\_  
 (to file another appeal, please use another form)

Filing Party (Jurisdiction or HCD)  
 \_\_\_\_\_

Filing Party Contact Name \_\_\_\_\_ Filing Party Email: \_\_\_\_\_  
 \_\_\_\_\_

**APPEAL AUTHORIZED BY:**

Name: \_\_\_\_\_

**PLEASE SELECT BELOW:**

- Mayor
- Chief Administrative Office
- City Manager
- Chair of County Board of Supervisors
- Planning Director
- Other: \_\_\_\_\_

**BASES FOR APPEAL**

- Application of the adopted Final RHNA Methodology for the 6<sup>th</sup> Cycle RHNA (2021-2029)
- Local Planning Factors and/or Information Related to Affirmatively Furthering Fair Housing (See Government Code Section 65584.04 (b)(2) and (e))
  - Existing or projected jobs-housing balance
  - Sewer or water infrastructure constraints for additional development
  - Availability of land suitable for urban development or for conversion to residential use
  - Lands protected from urban development under existing federal or state programs
  - County policies to preserve prime agricultural land
  - Distribution of household growth assumed for purposes of comparable Regional Transportation Plans
  - County-city agreements to direct growth toward incorporated areas of County
  - Loss of units contained in assisted housing developments
  - High housing cost burdens
  - The rate of overcrowding
  - Housing needs of farmworkers
  - Housing needs generated by the presence of a university campus within a jurisdiction
  - Loss of units during a state of emergency
  - The region's greenhouse gas emissions targets
  - Affirmatively furthering fair housing
- Changed Circumstances (Per Government Code Section 65584.05(b), appeals based on change of circumstance can only be made by the jurisdiction or jurisdictions where the change in circumstance occurred)

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_ Hearing Date: \_\_\_\_\_ Planner: \_\_\_\_\_

**Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form**  
*All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.*  
*Appeals and supporting documentation should be submitted to [housing@scaq.ca.gov](mailto:housing@scaq.ca.gov).*  
*Late submissions will not be accepted.*

**Brief statement on why this revision is necessary to further the intent of the objectives listed in Government Code Section 65584 (please refer to Exhibit C of the Appeals Guidelines):**

**Please include supporting documentation for evidence as needed, and attach additional pages if you need more room.**

**Brief Description of Appeal Request and Desired Outcome:**

**Number of units requested to be reduced or added to the jurisdiction's draft RHNA allocation (circle one):**

Reduced \_\_\_\_\_ Added \_\_\_\_\_

**List of Supporting Documentation, by Title and Number of Pages**  
**(Numbers may be continued to accommodate additional supporting documentation):**

- 1.
  
- 2.
  
- 3.

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_

Hearing Date: \_\_\_\_\_

Planner: \_\_\_\_\_

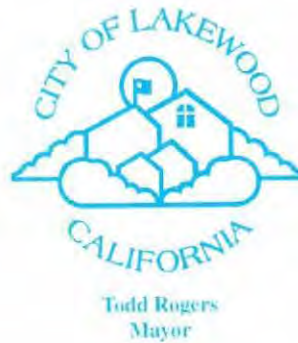


Jeff Wood  
Vice Mayor

Vicki L. Stuckey  
Council Member

Steve Croft  
Council Member

Ariel Pe  
Council Member



October 26, 2020

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

## **CITY OF LAKEWOOD - REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) APPEAL**

Dear Mr. Ajise:

The City of Lakewood appreciates the opportunity to submit this letter requesting an appeal of the RHNA for the 6<sup>th</sup> Housing Cycle. Lakewood continues to be committed to facilitating and promoting the development of quality housing throughout the city. As we commence our Housing Element update process, we look forward to examining our current housing policies and implementing a comprehensive approach to increase the available housing supply at all income levels. However, the exponential increase in the 6<sup>th</sup> cycle RHNA allocation compared to the previous cycle raises serious questions about our ability to meet our allocation of 3,914 units. The inability to meet this allocation would result in the non-certification of our Housing Element. As such, the City of Lakewood is submitting this request for an appeal.

### **SECTION 1: BASES FOR APPEAL**

- 1) Local Planning Factors and/or Information Related to Affirmatively Furthering Fair Housing:
  - Availability of land suitable for urban development or for conversion to residential use
- 2) Changed Circumstances

### **SECTION 2: BRIEF STATEMENT ON WHY THIS REVISION IS NECESSARY TO FURTHER THE INTENT OF THE OBJECTIVES LISTED IN GOVERNMENT CODE SECTION 65584**

#### **I. Introduction**

The City of Lakewood ("City") appeals the City's proposed allocated share of the regional housing need included as part of SCAG's Draft RHNA Plan. The City's draft allocation is 3,914 units, and the City is requesting a reduction to **2,500 units**. This revision is necessary to further the intent of the objectives listed in Government Code Section 65584(d) for the following reasons:

- A. SCAG failed to consider local planning factors, namely the availability of land suitable for urban development or for conversion to residential use; and
- B. Changed circumstances brought about by the recent global COVID-19 pandemic.

# Lakewood

**II. Bases For Appeal**

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

The City of Lakewood is a built out community, with very few vacant sites suitable for future land development. Since its incorporation in 1954, the both population and total households have remained relatively steady. The Department of Finance estimates the current population to be 81,352, and total households are 25,957. With a total area of 9.5 square miles, Lakewood’s population density of 8,563 persons per square mile is greater than both the City of Los Angeles (8,008 persons/sq. mi.) and Los Angeles County (7,372 persons/sq. mi.).

The City is primarily a residential community, with a mix of predominantly single-family homes and multi-family uses. Only 7.67% of the total land use dedicated for commercial and industrial uses. This small percentage of land use dedicated for non-residential uses makes it difficult to develop for large numbers of housing units.

The City’s 2013-2021 Housing Element, identified 16 vacant sites as suitable for development. Of these, 5 have been developed for housing and 11 still remain vacant, however 5 of these are City-owned and are currently in the process of developer selection for multi-family housing.

As discussed above, there is a very small amount of commercial or industrial sites that could be considered for future residential development, and of these many are restricted for residential use due to their proximity to the Long Beach Airport, which imposes restrictions on residential use. Other than these larger restricted sites, there are very few under-utilized parcels that would be suitable for residential development of any significance.

As a densely populated and built-out suburban community, Lakewood has a high burden on its infrastructure and roads, open space, schools, and other services. Yet, unlike many jurisdictions that have a diverse land use mix, Lakewood is primarily a residential community, with only 7.67% of land use designated as commercial or industrial. Unlike other jurisdictions, Lakewood does not have underperforming mid-block commercial centers that can be converted to housing, as our commercial development is located on small corner nodes. The proposed allocation of units will prove detrimental, as we would be forced to designate our already small percentage of non-residential land uses to future residential development.

Furthermore, the City anticipates that the rising popularity of e-commerce, coupled with the displacement of existing commercial, office, and industrial uses to accommodate housing will negatively impact job growth within the City and will invariably lead to a net reduction in employment within the City over the next several decades to 2045. This factor needs serious consideration in order for meaningful development of housing to actually occur, not just within the City, but within the region as a whole.

Accordingly, the City requests that its allocation be revised downward to reflect this local planning factor and constraint on development of housing, as previously identified above in Section II (B).

**B. Changed Circumstances**

The current 6<sup>th</sup> Housing Cycle is the culmination of several years of planning and analysis focused on developing a RHNA to address the need for new housing production statewide. The case for developing ever more housing has been championed by many in Sacramento, in particular Governor Newsom, who stated that his goal was to build 3.5 million new homes by 2025. However, Governor Newsom later clarified his stance and admitted that his stated goal was a “stretch goal” and that the state release a more

pragmatic estimate of housing needs by region. The for the SCAG region, the “pragmatic” estimate was anything but. The regional determination of 1.34 million housing units combined with the inequitable RHNA methodology, which does not include local input, are setting up local jurisdictions for failure to comply with state housing law.

Likewise, the recent COVID-19 pandemic has added an unforeseen challenge in meeting our regional housing goals. As the 6<sup>th</sup> Housing Cycle planning period was drawing to a close, the world was struck by a global pandemic that has resulted in the deaths of 223,000 thousand in the United States and over 1.14 million worldwide. This drastic change in circumstances should give us reason to pause and consider the long term implications of pushing forth on such a dramatic increase to our overall housing production mandates. Notwithstanding some examples of highly dense cities being able to cope with COVID-19, it is not unreasonable to suggest that greater density overall can lead to a greater possibility of transmission.

There is still much to be learned about the relationship between the spread of the virus and overall housing density, particularly in an area as large and dense as the SCAG region. Rather than just ask for a reduction to Lakewood’s allocation, we would ask that SCAG consider objecting, once more, to the regional determination of 1.34 million housing units. Because of the current COVID-19 pandemic, and the public’s concerns over compromised public health and safety, the plan to dramatically increase housing density should be put on hold and re-analyzed based on the changed circumstances.

### **III. These Revisions Further The Government Objectives Under Government Code Section 65584.**

The City of Lakewood is requesting consideration of a revision to its 6<sup>th</sup> RHNA cycle allocation in an effort to ensure that the City is able to reasonably attain and further the objectives of Government Code Section 65584. The City aims to increase its housing supply and diversify the type of housing available throughout the City; however, the limitations of a built-out urban community restrict some of the potential to achieve these goals.

This request for a new assessment of its 6<sup>th</sup> RHNA cycle allocation is a result of the City’s sincere and earnest approach at developing a successful Housing Element update. The City is aware of the existing constraints that exist for this community and the various factors that contribute to successful housing developments.

This request is made with understanding of the difficult position that HCD has created for SCAG by not accepting the September 18, 2019 letter and its valid interpretation of Government Code 65584.01(a) and 65584.01(c)(2)(B). One goal of Government Code Section 65584 is to promote infill and socioeconomic equity in Housing Element Updates. This is something that the City supports and seeks to attain however, the City’s goal is not only to promote housing to promote quality housing that incorporates the mixed housing types into the community overall.

### **SECTION 3: BRIEF DESCRIPTION OF APPEAL REQUEST AND DESIRED OUTCOME**

The City of Lakewood’s existing constraints and the adoption of several new housing bills (SB35, SB166, AB1397) foster a challenge to the successful implementation of the Housing Element Update. The City is committed to promoting the development of a mix of quality housing units throughout the community to satisfy its share of the need for residential growth in the region but, it does want to ensure that it is planning for its fair share of the need. Based on what we expect will be thorough Housing Element analysis of our existing zoning code, identification of potential housing sites, and continued approval of accessory dwelling units, we anticipate that we will be able to reasonably plan for the development of 2,500 new housing units during the life of the 6<sup>th</sup> Cycle.

**SECTION 4: NUMBER OF UNITS REQUESTED TO BE REDUCED OR ADDED TO THE JURISDICTION'S DRAFT RHNA ALLOCATION:**

Reduced: 1,414 units

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The City of Lakewood appreciates SCAG's efforts on the RHNA process to date and requests that our appeal be considered accordingly. We look forward to your determination and to continuing this cooperative process together. Should you have any questions regarding our appeal, please contact Abel Avalos, Director of Community Development, (562) 866-9771, ext. 2301, or [aavalos@lakewoodcity.org](mailto:aavalos@lakewoodcity.org).

Sincerely,



Thaddeus McCormack  
City Manager

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Ave  
Sacramento, CA 95833-1829  
916) 263-2911 FAX: (916) 263-7453  
www.hcd.ca.gov



December 10, 2020

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

Dear Executive Director Ajise:

**RE: Comment on Appeals of the Draft Regional Housing Need Allocation (RHNA) Plan**

Thank you for the opportunity to comment on the 52 appeals Southern California Association of Governments (SCAG) has received regarding the draft RHNA plan. The appeal process is an important phase in the development of a RHNA plan that ensures that all relevant factors and circumstances are considered.

The only circumstances under which a jurisdiction can appeal are:

- 65584.05(b)(1): The council of governments failed to adequately consider the information regarding the factors listed in subdivision (e) of section 65584.04.
- 65584.05(b)(2): The council of governments failed to determine the share of the regional housing need in a manner that furthers the intent of the objectives listed in subdivision (d) of section 65584.
- 65584.05(b)(3): A significant unforeseen change in circumstances occurred in the local jurisdiction that merits a revision of the information submitted pursuant to subdivision (e) of Section 65584.04.

The California Department of Housing and Community Development (HCD) urges SCAG to only consider appeals that meet these criteria.

Per Government Code section 65584.05(e)(1), SCAG's final determination on whether to accept, reject, or modify any appeal must be accompanied by written findings, including how the final determination is based upon the adopted RHNA allocation methodology, and how any revisions are necessary to further the statutory objectives of RHNA described in Government Code section 65584(d).

Among the appeals based on Government Code section 65584.05(b)(1), several appeals state that SCAG failed to consider the factor described in Government Code section 65584.04(e)(2)(B), citing the lack of land suitable for development as a basis for the appeal. However, this section states the council of governments may not limit its consideration of suitable housing sites to existing zoning and land use restrictions and must consider the potential for increased development under alternative zoning and

land use restrictions. Any comparable data or documentation supporting this appeal should contain an analysis of not only land suitable for urban development, but land for conversion to residential use, the availability of underutilized land, and opportunity for infill development and increased residential densities. In simple terms, this means housing planning cannot be limited to vacant land, and even communities that view themselves as built out must plan for housing through means such as rezoning commercial areas as mixed-use areas and upzoning non-vacant land.

With regard to appeals submitted related to Government Code section 65584.05(b)(2), that SCAG failed to determine the RHNA in a manner that furthers the statutory objectives, it should be noted that HCD reviewed SCAG's draft allocation methodology and found that the draft RHNA allocation methodology furthered the statutory objectives described in Government Code section 65584.

Among the appeals based on Government Code section 65584.05(b)(2), several contend that the cap on units allocated to extremely disadvantaged communities (DACs) does not further RHNA's statutory objectives. This cap furthers the statutory objective to affirmatively further fair housing by allocating more units to high opportunity areas and fewer units to low resource communities, and concentrated areas of poverty with high levels of segregation. Due to the inclusion of this factor, as well as the use of TCAC/HCD Opportunity Maps, SCAG's methodology allocates 14 of the top 15 highest shares of lower-income RHNA to jurisdictions with over 99.95 percent High and Highest Resource areas. With the exceptions of two jurisdictions, the 31 jurisdictions with the highest share of lower-income RHNA are all over 95 percent High and Highest Resource areas. Any weakening of these inputs to the methodology could risk not fulfilling the statutory objective to affirmatively further fair housing.

Several appeals argue that SCAG's RHNA allocation methodology does not adequately promote access to jobs and transit, as required in objectives two and three. HCD's review of SCAG's RHNA methodology found the allocation does further the environmental principles of objective two. SCAG's overall allocation includes significant weight related to the location of high-quality transit areas and the regional distribution of jobs that can be accessed within a 30-minute driving commutes. Regarding objective three, HCD's analysis as to whether jobs-housing fit was furthered by SCAG's draft methodology found that across all jurisdictions there is generally good alignment between low-wage jobs and lower-income RHNA, with all but 15 jurisdictions within a half percent plus or minus difference between their share of lower-income RHNA for the region and their percentage low-wage jobs for the region.

Several appeals are based upon the provision described in Government Code section 65584.05(b)(3), arguing that the COVID-19 pandemic represents a significant and unforeseen change in circumstances that will affect future population and job growth. Ensuring everyone has a home is critical to public health. Reducing and preventing overcrowding and homelessness are essential concerns for every community. The COVID-19 pandemic has only increased the importance that each community is planning for sufficient affordable housing.

Lastly, several appeals state that the Regional Housing Needs Determination (RHND) HCD provided to the SCAG region is too large. SCAG submitted an objection to the RHND at the appropriate time and through the appropriate process. HCD considered those objections and [determined the final RHND for 6<sup>th</sup> Housing Element Cycle for the SCAG region on October 15, 2019](#). There are no further appeal procedures available to alter the SCAG region's RHND for this cycle. Government Code section 65584.05(b) does not allow local governments to appeal the RHND during the 45-day period following receipt of the draft allocation.

HCD acknowledges that many local governments will need to plan for more housing than in the prior cycle to accommodate a RHND that more fully captures the housing need and as the statutory objectives of RHNA shift more housing planning near jobs, transit, and resources. The Southern California region's housing crisis requires each jurisdiction to plan for the housing needs of their community and the region. In recognition of this effort there are more resources available than ever before to support jurisdictions as they prepare to update their 6<sup>th</sup> cycle housing elements:

- SB 2 Planning Grants – \$123 million one-time allocation to cities and counties
- SB 2 Planning Grants Technical Assistance offered to all jurisdictions
- Regional and Local Early Action Planning Grants – \$238 million one-time allocation for local and regional governments
- SB 2 Permanent Local Housing Allocation – approximately \$175 million annually in ongoing funding for local governments to increase affordable housing stock

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Megan Kirkeby, Deputy Director, [megan.kirkeby@hcd.ca.gov](mailto:megan.kirkeby@hcd.ca.gov).



Megan Kirkeby  
Deputy Director



# City of Whittier

13230 Penn Street, Whittier, California 90602-1716  
(562) 567-9320 Fax (562) 567-2872 www.cityofwhittier.org

Electronically Transmitted to: [Housing@scag.ca.gov](mailto:Housing@scag.ca.gov)

December 10, 2020

RHNA Appeals Committee  
Southern California Association of Governments  
900 Wilshire Blvd, Suite 1700  
Los Angeles, CA 90017

SUBJECT: City of Whittier's Comments on Appeals to the Sixth Cycle Regional Housing Needs Assessment (RHNA) Allocation

Honorable Chair and Honorable Committee Members:

The City of Whittier ("City") appreciates the challenges that are inherent in allocating 1,341,827 housing units by the thousands (a 226% increase above the baseline 412,137 unit) to cities across Southern California, especially in built-out cities. However, the City is deeply concerned its housing allocation of 3,431 units from the State Department of Housing and Community Development ("HCD") and the Southern California Association of Government's ("SCAG") unit distribution methodology, along with recent housing legislation will fundamentally abridge the City's ability to develop effective land-use policies that are appropriate for managing the community's actual needs. The 878 units in the 5<sup>th</sup> cycle RHNA allocation has been increased by 290% to 3,431 units in the current 6<sup>th</sup> cycle. Particularly challenging in the 6<sup>th</sup> cycle, is the number of low and very low-income units (1,558) which combined with the moderate and above moderate unit totals forces unplanned and unnecessary residential densification of the community.

The affordable units are an unfunded mandate with very limited regional or State financial support for their development. Considering the affordable housing subsidies typically range from \$50,000 to \$250,000 per unit, the overall funding requirements could range from \$78,000,000 to \$390,000,000 which is clearly beyond the reach of the City of Whittier in that the City's general fund budget is just \$72,000,000 which already include \$2,000,000 annually to house the City's unsheltered residents in transitional housing. Additionally, the City only receives 7.5% of each property tax dollar to provide general services including police and library services.

The City is currently in the process of updating its Housing Element as well as the General Plan to incorporate the current RHNA allocation, so Whittier is acutely aware of the various housing needs as well as the potential obstacles, such as aging infrastructure and unplanned density, to creating the requisite housing within a city that



is essentially built out. The changes in the State's housing laws (SB 35, SB 166 and AB 1397) have created additional constraints for the agencies and may severely impact the City's ability to accomplish our regional and local housing goals.

Since development in Whittier began more than 130 years ago, the City is virtually built-out with little developable vacant land outside of its designated open space areas that are dedicated to accommodating existing and future residents. While the City has made significant efforts through its specific plans to densify existing corridors and districts, the majority of Whittier's remaining single-family residential neighborhoods cannot accommodate similar densification. Furthermore, the hills north of Whittier contain regional open space, sensitive habitat and wildlife areas that must be preserved in perpetuity. There are also significant infrastructure and water service constraints that impact Whittier's ability to produce significantly more housing. Although these facts may not be desirable, they must be pragmatically accounted for and mitigated by not further increasing Whittier's share of housing units contained in SCAG's 6<sup>th</sup> Cycle RHNA. The final RHNA allocation and methodology must be fair and equitable while reflecting the capacity for reasonable housing unit construction.

As with many other cities, the City is concerned about the current allocation, but an even greater concern is that additional units may be applied to the City if reallocated from cities that are successful in their appeals. To that end, the City believes the appeal process itself was unclear as to the potential ramifications to other cities and not fully understood.

Although we fully support the surrounding cities in their appeals, the potential for additional units being applied to the City would exacerbate the problems described herein and in Whittier's September 13, 2019 letter to SCAG.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Jeffery S. Adams  
Director of Community Development

File

**From:** Christopher Koontz <Christopher.Koontz@longbeach.gov>  
**Sent:** Thursday, December 3, 2020 11:14 AM  
**To:** Regional Housing  
**Subject:** RHNA Appeals

**Categories:** Response Required, Record

Good morning,

The purpose of this email is to provide the City of Long Beach’s position in regards to pending RHNA appeals before SCAG. The City of Long Beach seeks to meet its housing needs and obligations for the benefit of Long Beach residents and the region. Our allocation was extremely large and presents a planning and financing challenge for the City. Nonetheless we chose not to appeal our allocation because the allocation process was fair and transparent including taking the City of Long Beach’s input into consideration.

We oppose and will not accept any transfer of additional allocation due to the pending appeals. We note that within our area, the Gateway COG, appeals are pending from Bellflower, Cerritos, Downey, Huntington Park, La Mirada, Lakewood, Pico Rivera, and South Gate. Each of these appeals should be evaluated by SCAG on the merits, however Long Beach opposes any transfer of allocation to our City. It would be inappropriate to transfer a further burden to Long Beach when we have already accepted a large allocation and have done more than many cities in the region to accommodate housing growth under the current RHNA cycle, including fully meeting our market-rate RHNA allocation.

The City of Long Beach will continue to work with SCAG and our neighbor jurisdictions to address the housing needs of our residents.

We thank you for consideration and please do not hesitate to contact the City regarding our position.

Christopher Koontz, AICP  
*Deputy Director*

Development Services  
411 W. Ocean Blvd., 3rd Floor | Long Beach, CA 90802  
Office: 562.570.6288 | Fax: 562.570.6068





Southern California Association of Governments  
Remote Participation Only  
January 8, 2021

**To:** Regional Housing Needs Assessment Subcommittee (RHNA)

**EXECUTIVE DIRECTOR'S  
APPROVAL**

**From:** Karen Calderon, Associate Regional Planner,  
(213) 236-1983, calderon@scag.ca.gov

**Subject:** Appeal of the Draft RHNA Allocation for the City of La Mirada

**RECOMMENDED ACTION:**

Deny the appeal filed by City of La Mirada (City) to reduce the Draft RHNA Allocation for the City.

**STRATEGIC PLAN:**

This item supports the following Strategic Plan Goal 2: Advance Southern California’s policy interests and planning priorities through regional, statewide, and national engagement and advocacy.

**SUMMARY OF APPEAL:**

The City of La Mirada requests a reduction (without a specific number) of its RHNA allocation based on the following issues:

1. Application of the adopted Final RHNA Methodology for the 6<sup>th</sup> Cycle RHNA - the Final RHNA Methodology is unrealistic and inconsistent with their housing projection and requests an alternative methodology be adopted.
2. Sewer or water infrastructure constraints for additional development - existing infrastructure is unable to support the water and wastewater requirements for their RHNA allocation.
3. Availability of land suitable for urban development or for conversion to residential use - City is fully developed and unable to accommodate the RHNA allocation without elimination of other uses or infill development, which would be inconsistent with the City’s General Plan and zoning densities.
4. Lands protected from urban development under existing federal or state programs - the only existing sources of open space in the city include the County owned parkland and recreation areas that are not under City control.
5. Housing needs generated by the presence of a university campus within a jurisdiction - housing at Biola University was not considered.

**RATIONALE FOR STAFF RECOMMENDATION:**

**OUR MISSION**

*To foster innovative regional solutions that improve the lives of Southern Californians through inclusive collaboration, visionary planning, regional advocacy, information sharing, and promoting best practices.*

**OUR VISION**

*Southern California’s Catalyst for a Brighter Future*

**OUR CORE VALUES**

*Be Open | Lead by Example | Make an Impact | Be Courageous*

Staff have reviewed the appeal and recommend no change to the City of La Mirada's RHNA allocation. Based on Issue 1, an appeal citing RHNA methodology as its basis must appeal the application of the adopted methodology, not the methodology itself, and alternative methodologies cannot be considered as a basis for an appeal. Additionally, no evidence of inconsistent household growth projections was provided. Based on Issue 2, costs to upgrade and develop appropriate infrastructure cannot be considered by SCAG as a justification for a reduction in the RHNA allocation and evidence from a utility service provider that would preclude the construction of new housing was not demonstrated. Issue 3 was not demonstrated to be an impediment to meeting La Mirada's RHNA allocation since the City does not consider the possibility of alternate zoning, which is required to be considered. Based on Issues 4 and 5, no evidence was provided that the jurisdiction cannot accommodate its RHNA allocation in alternate areas or how housing need is impacted by the university.

**BACKGROUND:****Draft RHNA Allocation**

Following the adoption of the Final RHNA Methodology on March 5, 2020 and the adoption of Connect SoCal on September 3, 2020, all local jurisdictions received Draft RHNA Allocations on September 11, 2020. A summary is below.

**Total RHNA for the City of La Mirada: 1,957 units**

Very Low Income: 633 units  
Low Income: 341 units  
Moderate Income: 319 units  
Above Moderate Income: 664 units

Additional background related to the Draft RHNA Allocation is included in Attachment 1.

**Summary of Comments Received during 45-day Comment Period**

No comments were received from local jurisdictions or HCD during the 45-day public comment period described in Government Code section 65584.05(c) which specifically regard the appeal filed for the City of La Mirada. Three comments were received which relate to appeals filed generally:

- HCD submitted a comment on December 10, 2020 delineating the statutory basis for RHNA appeals and the requirement that any appeals granted must include written findings regarding how revisions are necessary to further RHNA's statutory objectives.

- The City of Whittier submitted a comment on December 10, 2020 supporting surrounding cities in their appeals but expressing concern that additional units may be applied to Whittier if reallocated from cities which are successful in their appeals.
- The City of Long Beach submitted a comment on December 3, 2020 indicating their view that the RHNA allocation process was fair and transparent, their support for evaluating appeals on their merits (specifically those from the Gateway Council of Governments), and their opposition to any action which would result in a transfer of additional units to Long Beach.

**ANALYSIS:*****Issue 1: Application of the adopted Final RHNA Methodology for the 6th Cycle RHNA (2020-2029).***

*The City argues the Final RHNA methodology's use of a regionally-focused, shift-share model fails to consider the City's ability to develop almost 2,000 units during the RHNA period. The methodology also did not demonstrate a nexus between existing population and the housing projection for the City of La Mirada. Specifically, the City claims its population growth has been stable and even declining in recent years. The City requests the use of an alternative RHNA methodology that reflects real demographic trends.*

**SCAG Staff Response:** As described above and in Attachment 1: Local Input and Development of Draft RHNA Allocation, the Final RHNA Methodology was adopted by the Regional Council on March 5, 2020 and describes the various policy factors whereby housing unit need is to be allocated across the region—for example, anticipated growth, access to jobs and transit, and vacancy. The methodology makes extensive use of locally-reviewed input data and describes data sources and how they are calculated in detail. On January 13, 2020, the RHNA methodology was found by HCD to further the five statutory objectives in large part due to its use of objective factors and as such cannot consider factors differently in one jurisdiction versus another.

An appeal citing RHNA methodology as its basis must appeal the application of the adopted methodology, not the methodology itself. An example of an improper application of the adopted methodology might be a data error which was identified by a local jurisdiction. Rather than explaining how SCAG failed to properly apply the methodology, the City simply questions the approach of the Final RHNA Methodology and suggests the use of an alternate methodology.

The City also asserts that SCAG has failed to demonstrate or provide a nexus between a realistic population and housing projection for the City and the RHNA given that the City's population growth has been relatively stable or has actually declined. Per Government Code Section 65584.04(g)(3), SCAG cannot consider stable population numbers in a jurisdiction from previous RHNA cycles as either a reduction or determination of its RHNA allocation. SCAG's Growth Forecast

is used as a basis to determine population, household, and employment growth at the regional and jurisdictional levels, and is used for the basis of Connect SoCal as well. The Growth Forecast was developed over the course of approximately two years, using a panel of experts and review from partners and local jurisdictions, which was also known as “local input.” No evidence or concerns regarding long term population loss were raised by the City during the opportunities to provide local input on household growth in the Growth Forecast. See Attachment 1, “Local Input and Development of Draft RHNA Allocation” which summarizes the extent of local engagement and review opportunities provided to local jurisdictions on the household growth forecast. Review opportunities began in October 2017. While the initial deadline for input was October 2018, additional review opportunities were provided to all local jurisdictions through June 2020.

However, forecasted growth comprises only one part of SCAG’s adopted 6<sup>th</sup> cycle RHNA methodology. The policy direction of SCAG’s Regional Council was to include “existing need” in addition to using growth forecast data to allocate RHNA. The RHNA identifies anticipated housing need over a specified eight-year period and requires that local jurisdictions make available sufficient zoned capacity to accommodate this need. In contrast, the Connect SoCal Growth Forecast is an assessment of the reasonably foreseeable future pattern of growth given, among other factors, the availability of zoned capacity. 1502 units, or 77% of La Mirada’s draft RHNA allocation, come from existing need measures, namely transit accessibility and job accessibility. Specifically, as indicated in Attachment 1, the share of future (2045) regional jobs which can be reached in a 30-minute automobile commute from the local jurisdiction’s median TAZ is used as to allocate housing units based on job accessibility. From the City of La Mirada’s median TAZ, it will be possible to reach 17.05% of the region’s jobs in 2045 within a 30-minute automobile commute (1,713,000 jobs, based on Connect SoCal’s 2045 regional job forecast of 10,049,000 jobs), as shown in the Map of Job Accessibility in the City of La Mirada, attached. Thus, La Mirada is thus encouraged to look at which opportunities might exist to accommodate more housing given these regional existing need factors. The RHNA methodology itself cannot be changed through the appeals process and as such staff cannot recommend a reduction on this basis.

***Issue 2: Sewer and water infrastructure constraints for additional development [Government Code Section 65584.04(e)(2)(A)].***

*The City argues existing infrastructure is unable to support the water and wastewater requirements. To accommodate the new infill development for the 6<sup>th</sup> RHNA Cycle, most of the City's neighborhoods would require major water and sewer upgrades. The City is unsure how this new infrastructure would be financed.*

**SCAG Staff Response:** Government Code Section 65584(e)(2)(A) indicates that, to the extent sufficient data is available, the following opportunities/constraints should be considered in developing the RHNA methodology:

“Lack of capacity for sewer or water service due to federal or 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.”

For Government Code Section 65584.04(e)(2)(A) to apply in this case, the jurisdiction must be precluded from providing necessary infrastructure for additional development due to supply and distribution decisions made by a sewer or water provider other than the local jurisdiction. For the water constraints mentioned by the jurisdiction, it is not evident that the respective water provider has rendered a decision that would prevent the jurisdiction from providing necessary infrastructure. Costs to upgrade and develop appropriate infrastructure cannot be considered by SCAG as a justification for a reduction since the RHNA Allocation is not a building quota. Rather, a jurisdiction is required to plan and zone for housing need and is not penalized for not developing the assigned units. For this reason, SCAG staff does not recommend a housing need reduction based upon this planning factor.

***Issue 3: Availability of land suitable for urban development or for conversion to residential use [Government Code Section 65584.04(e)(2)(B)].***

*The City argues La Mirada is fully developed with mostly residential uses. Adding more residential development would require elimination of commercial and industrial uses that provide jobs and revenue for the City or infill development that would be inconsistent with the City's zoning densities and require removal of existing housing. At the highest permitted development density, the City calculates a total of 70 acres would be required to meet the RHNA allocation. Therefore, the land area required to accommodate the RHNA allocation far exceeds the City's current available land supply of either vacant or underutilized land. The City maintains RHNA allocations must be consistent with the City's General Plan buildout and requests SCAG review General Plan Land Use maps to ascertain the City's carrying capacity and identify where new housing units would be placed as it has done past RHNA cycles.*

**SCAG Staff Response:** Legislative changes in 2018 modified the nature of the regional housing need determination for the 6th Cycle RHNA. Specifically, Government Code 65584.01(b) et seq. explicitly added measures of household overcrowding and housing cost burden to the list of factors to be considered by the California Department of Housing and Community Development (HCD) for the determination of housing need, captured in the adopted Final RHNA Methodology as “existing need”. Thus, the 6th Cycle RHNA regional housing need total of 1,341,827, as determined by HCD, consists of both “projected need,” which is intended to accommodate the growth of population and households during the 6th Cycle RHNA (2021-2029), as well as “existing need”.

Pursuant to Government Code Section 65584.04(e)(2)(B), SCAG “may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality” (which includes the land use policies in its General Plan). “Available land suitable for urban development or conversion to residential use,” as expressed in 65584.04(e)(2)(b), is not restricted to vacant sites; rather, it specifically indicates that underutilized land, opportunities for infill development, and increased residential densities are a component of “available” land. As indicated by HCD in its December 10, 2020 comment letter (HCD Letter):

“In simple terms, this means housing planning cannot be limited to vacant land, and even communities that view themselves as built out must plan for housing through means such as rezoning commercial areas as mixed-use areas and upzoning non-vacant land.” (HCD Letter at p. 2).

As such, the City can consider other opportunities for development. This includes the availability of underutilized land, opportunities for infill development and increased residential densities, or alternative zoning and density. Alternative development opportunities should be explored further and could possibly provide the land needed to zone for the City’s projected growth.

Note that while zoning and capacity analysis is used to meet RHNA need, they should not be used to determine RHNA need at the jurisdictional level. Per the adopted RHNA methodology, RHNA need at the jurisdictional level is determined by projected household growth, transit access, and job access. Housing need, both existing and projected need, is independent of zoning and other related land use restrictions, and in some cases is exacerbated by these very same restrictions. Thus, land use capacity that is restricted by factors unrelated to existing or projected housing need cannot determine existing or projected housing need. Ultimately, it is the jurisdiction’s responsibility to update their General Plan (including Housing Element) to accommodate for both existing and projected housing need. For this reason, SCAG staff does not recommend a reduction to its draft RHNA allocation based on this factor.

***Issue 4: Lands protected from urban development under existing federal or state programs [Section 65584.04(e)(2)(C)].***

*The City argues the only existing sources of open space in the city include the County owned parkland and recreation areas that are not under the land use control of the City of La Mirada.*

**SCAG Staff Response:** An appeal citing protected lands as its basis must provide evidence that its lands are protected by federal and state programs. While the jurisdiction has indicated it cannot accommodate units in County-owned areas, no evidence has been provided that the jurisdiction cannot accommodate its RHNA allocation in other areas. The presence of protected open space alone does not reduce housing need, nor does it preclude a jurisdiction from accommodating its



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housing need elsewhere. For the reasons, SCAG staff does not recommend a reduction to the jurisdiction's RHNA allocation based on this factor.

***Issue 5: Housing needs generated by the presence of a university campus within a jurisdiction [Section 65584.04(e)(9)].***

*The City argues housing characteristics unique to the City, such as student housing at Biola University, were not considered in the formulation of the City's RHNA allocation.*

**SCAG Staff Response:** SCAG considered the housing need generated by universities at a regional level as part of the adopted Final RHNA Methodology. However, the presence of a university alone is not a sufficient basis for a RHNA allocation reduction, the City needs to demonstrate how the jurisdiction's housing need is impacted with the presence of the university. The jurisdiction provides no basis to support a reduction in their draft RHNA Allocation. For this reason, SCAG staff does not recommend a reduction in the jurisdiction's Draft RHNA Allocation based on this planning factor.

**FISCAL IMPACT:**

Work associated with this item is included in the current FY20-21 Overall Work Program (300-4872Y0.02: Regional Housing Needs Assessment).

**ATTACHMENT(S):**

1. Local Input and Development of Draft RHNA Allocation (City of La Mirada)
2. Appeal Form and Supporting Documentation (City of La Mirada)
3. City of La Mirada 2013-2021 Housing Element
4. Map of Job Accessibility in the City of La Mirada
5. Comments Received During the Comment Period (General)

## **Attachment 1: Local Input and Development of Draft RHNA Allocation**

This attachment sets forth the nature and timing of the opportunities which the City of La Mirada had to provide information and local input on SCAG's growth forecast, the RHNA methodology, and the Growth Vision of the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). It also describes how the RHNA Methodology development process integrates this information in order to develop the City of La Mirada's Draft RHNA Allocation.

### **1. Local Input**

#### ***a. Bottom-Up Local Input and Envisioning Process***

On October 31, 2017, SCAG took the first step toward developing draft RHNA allocations by initiating the Bottom-Up Local Input and Envisioning Process. At the direction of the Regional Council, the objective of this process was to seek local input and data to prepare for Connect SoCal and the 6<sup>th</sup> cycle of RHNA.<sup>1</sup> Each jurisdiction was provided with a package of land use, transportation, environmental, and growth forecast data for review and revision which was due on October 1, 2018.<sup>2</sup> While the local input process materials focus principally on jurisdiction-level and Transportation Analysis Zone (TAZ) level growth, input on specific parcels, sites, and project areas were welcomed and integrated into SCAG's growth forecast as well as data on other elements. SCAG met one-on-one with all 197 local jurisdictions between November 2017 and July 2018 and provided training opportunities and staff support. Following input from SCAG's Technical Working Group (TWG), the Connect SoCal growth forecast reflected precisely the jurisdiction-level growth totals provided during this process.

The local input data included SCAG's preliminary growth forecast information. For the City of La Mirada, the anticipated number of households in 2020 was 14,985 and in 2030 was 15,525 (growth of 540 households). In May 2018, SCAG staff met with local jurisdiction staff to discuss the Bottom-Up Local Input and Envisioning Process and answer questions. Input was not received. The preliminary figures above were used by SCAG.

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<sup>1</sup> While the RTP/SCS and RHNA share data elements, they are distinct processes. The RTP/SCS growth forecast provides an assessment of reasonably foreseeable future patterns of employment, population, and household growth in the region given demographic and economic trends, and existing local and regional policy priorities. The RHNA identifies anticipated housing need over a specified eight-year period and requires that local jurisdictions make available sufficient zoned capacity to accommodate this need. A further discussion of the relationship between these processes can be found in Connect SoCal Master Response 1 at: [https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal\\_Public-Participation-Appendix-2.pdf](https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal_Public-Participation-Appendix-2.pdf).

<sup>2</sup> A detailed list of data during this process reviewed can be found in each jurisdiction's Draft Data/Map Book at <http://scagrtpscs.net/Pages/DataMapBooks.aspx>

### **b. RHNA Methodology Surveys**

On March 19, 2019, SCAG distributed a packet of methodology surveys, which included the local planning factor survey (formerly known as the AB2158 factor survey), Affirmatively Furthering Fair Housing (AFFH) survey, and replacement need survey, to SCAG jurisdictions' Community Development Directors. Surveys were due on April 30, 2019. SCAG reviewed all submitted responses as part of the development of the draft RHNA methodology. The City of La Mirada submitted the following surveys prior to the adoption of the draft RHNA methodology:

- Local planning factor survey
- Affirmatively Furthering Fair Housing (AFFH) survey
- Replacement need survey
- No survey was submitted to SCAG

### **c. Connect SoCal Growth Vision and Additional Refinements**

Beginning in May 2018, SCAG's Sustainable Communities Working Group began the process of developing growth scenarios for the SCAG region. The culmination of this work was the development of the Connect SoCal Growth Vision, which directly uses jurisdictional-level growth projections from the Bottom-Up Local Input and Envisioning process, and also features strategies for growth at the TAZ-level that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Additional detail regarding the Connect SoCal Growth Vision, specifically the Transportation Analysis Zone (TAZ, or neighborhood) level projections is found at <https://www.connectsocal.org/Documents/DataMapBooks/Growth-Vision-Methodology.pdf>.

As a result of these strategies, in some jurisdictions growth at the TAZ-level differed from locally anticipated growth conveyed during the Bottom-Up Local Input and Envisioning Process.

As such, SCAG provided two additional opportunities for all local jurisdictions to make TAZ-level technical refinements on the topics of general plan capacities and entitlements. During the release of the draft Connect SoCal Plan, jurisdictions were notified on October 31, 2019 that SCAG would accept additional refinements until December 11, 2019. Following the Regional Council's decision to delay full adoption of Connect SoCal for 120 days due to the COVID-19 pandemic, all jurisdictions were again notified on May 26, 2020 that SCAG would accept additional refinements until June 9, 2020.

Connect SoCal Growth Vision data have been available to local jurisdiction staff during the entirety of this process through SCAG's Scenario Planning Model Data Management Site (SPM-DM) at <http://spmdm.scag.ca.gov> and updates were shared with local jurisdictions on technical refinements to the data in February 2020 and August 2020 to share the results of both review opportunities. SCAG

did not receive additional technical corrections from the City of La Mirada from which differed from the Growth Vision.

## 2. Development of the Final RHNA Methodology

SCAG convened the first meeting of the RHNA Subcommittee in October 2018. In their subsequent monthly meetings, this body reviewed and advised on the development of SCAG's 6<sup>th</sup> cycle RHNA process, including the development of the RHNA methodology. Per Government Code 65584.04(a), SCAG must develop a RHNA methodology which furthers the five statutory objectives of RHNA:

*(1) Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households.*

*(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.*

*(3) Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.*

*(4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.*

*(5) Affirmatively furthering fair housing (Govt. Code § 65584(d)).*

As explained in more detail below, the Draft RHNA Methodology (which was adopted as the Final RHNA Methodology) set forth the policy factors, data sources, and calculations which would be used to generate draft RHNA allocations for all local jurisdictions. Following extensive debate and public comment, SCAG's Regional Council voted to approve the Draft RHNA Methodology on November 7, 2019 and provide it to HCD for review. Per Government Code 65584.04(i), HCD is vested with the authority to determine whether a methodology furthers the objectives set forth in Government Code section 65584(d). On January 13, 2020, HCD found that the Draft RHNA Methodology furthers these five statutory objectives of RHNA. Specifically, HCD noted that:

*"This methodology generally distributes more RHNA, particularly lower income RHNA, near jobs, transit, and resources linked to long term improvements of life outcomes.*

*In particular, HCD applauds the use of the objective factors specifically linked the statutory objectives in the existing need methodology.” (Letter from HCD to SCAG dated January 13, 2020 at <https://scag.ca.gov/sites/main/files/file-attachments/hcd-review-rc-approved-draft-rhna-methodology.pdf?1602190239>).*

On March 5, 2020, again following extensive debate and public comment, the Regional Council voted to approve the Draft RHNA Methodology as the Final RHNA Methodology. Unlike SCAG’s 5<sup>th</sup> cycle RHNA methodology which relies almost entirely on the household growth component of the RTP/SCS, SCAG’s 6<sup>th</sup> cycle RHNA methodology consists of two primary elements: “projected need” which includes the number of housing units required to accommodate anticipated population growth over the 8-year RHNA planning period and “existing need,” which refers to the number of housing units required to accommodate excess or unsatisfied housing demand experienced by the region’s current population.<sup>3</sup> Furthermore, the Final RHNA methodology utilizes measures of 2045 job accessibility and High Quality Transit Area (HQTA) population measures based on TAZ-level projections in the Connect SoCal Growth Vision.

More specifically, the Final RHNA Methodology considers three primary factors in determining a local jurisdiction’s total housing need which are primarily based on data from Connect SoCal’s aforementioned Bottom-Up Local Input and Envisioning Process:

- Forecasted growth over 2020-2030 (projected need)
- Transit accessibility in 2045 (existing need)
- Job accessibility in 2045 (existing need)

The methodology is described in further detail at:

<http://scag.ca.gov/programs/Documents/RHNA/SCAG-Final-RHNA-Methodology-030520.pdf>.

### 3. Draft RHNA Allocation for the City of La Mirada

Following the adoption of the Final RHNA Methodology on March 5, 2020 and the 120 day delay due to the COVID-19 pandemic, SCAG adopted Connect SoCal on September 3, 2020, and the City of La Mirada received its draft RHNA allocation on September 11, 2020. Application of the RHNA methodology yields the draft RHNA allocation for the City of La Mirada as summarized in the data and calculations in the tables below.

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<sup>3</sup> Legislative changes in 2018 modified the nature of the regional housing need determination for the 6<sup>th</sup> cycle of RHNA by adding measures of household overcrowding and housing cost burden to the list of factors to be considered by HCD for the determination of housing need. These new measures are not included in the Connect SoCal Growth Forecast because they are not direct inputs to the growth forecasting process and are independent of employment and population projections. In contrast, they reflect additional latent housing needs in the current population (i.e. “existing need”) and does not affect a change in regional population. For further discussion see Connect SoCal Master Response 1 at [https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal\\_Public-Participation-Appendix-2.pdf](https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal_Public-Participation-Appendix-2.pdf).

| <b>La Mirada city statistics and inputs:</b>   |           |
|--|-----------|
| Forecasted household (HH) growth, RHNA period:<br><i>(2020-2030 Household Growth * 0.825)</i>  | 446       |
| Percent of households who are renting:   | 22%       |
| Housing unit loss from demolition (2009-18):   | 1         |
| Adjusted forecasted household growth, 2020-2045:<br><i>(Local input growth forecast total adjusted by the difference between the RHNA determination and SCAG's regional 2020-2045 forecast, +4%)</i> | 1,265     |
| Percent of regional jobs accessible in 30 mins (2045):<br><i>(For the jurisdiction's median TAZ)</i>   | 17.05%    |
| Jobs accessible from the jurisdiction's median TAZ (2045):<br><i>(Based on Connect SoCal's 2045 regional forecast of 10.049M jobs)</i>   | 1,713,000 |
| Share of region's job accessibility (population weighted):   | 0.33%     |
| Jurisdiction's HQTAs population (2045):  | -         |
| Share of region's HQTAs population (2045):   | 0.00%     |
| Share of population in low/very low-resource tracts:   | 0.07%     |
| Share of population in very high-resource tracts:  | 19.38%    |
| Social equity adjustment:  | 150%      |

| Calculation of Draft RHNA Allocation for La Mirada city   |             |
|---|-------------|
| Forecasted household (HH) growth, RHNA period:  | 446         |
| Vacancy Adjustment<br><i>(5% for renter households and 1.5% for owner households)</i>   | 10          |
| Replacement Need  | 1           |
| <b>TOTAL PROJECTED NEED:</b>  | <b>457</b>  |
| Existing need due to job accessibility (50%)  | 1372        |
| Existing need due to HQTAs pop. share (50%)   | 0           |
| Net residual factor for existing need<br><i>(Negative values reflect a cap on lower-resourced community with good job and/or transit access. Positive values represent this amount being redistributed to higher-resourced communities based on their job and/or transit access.)</i> | 130         |
| <b>TOTAL EXISTING NEED</b>  | <b>1502</b> |
| <b>TOTAL RHNA FOR LA MIRADA CITY</b>  | <b>1957</b> |
| Very-low income (<50% of AMI)   | 633         |
| Low income (50-80% of AMI)  | 341         |
| Moderate income (80-120% of AMI)  | 319         |
| Above moderate income (>120% of AMI)  | 664         |

The transit accessibility measure is based on the population anticipated to live in High-Quality Transit Areas (HQTAs) in 2045 based on Connect SoCal’s designation of high-quality transit areas and population forecasts. With no forecasted population living within HQTAs in 2045, the City of La

Mirada represents zero percent of the SCAG region's HQTAs population, which is the basis for allocating housing units based on transit accessibility.

Job accessibility is defined as the jurisdiction's share of regional jobs accessible within a 30-minute drive commute. Since over 80 percent of the region's workers live and work in different jurisdictions, the RHNA methodology uses a measure based on Connect SoCal's travel demand model output for the year 2045 rather than assigning housing units based on the number of jobs with a specific jurisdiction. Specifically, the share of future (2045) regional jobs which can be reached in a 30-minute automobile commute from the local jurisdiction's median TAZ is used as to allocate housing units based on transit accessibility. From the City of La Mirada's median TAZ, it will be possible to reach 17.05% of the region's jobs in 2045 within a 30-minute automobile commute (1,713,000 jobs, based on Connect SoCal's 2045 regional job forecast of 10,049,000 jobs).

An additional factor is included in the methodology to account for RHNA Objective #5 to Affirmatively Further Fair Housing (AFFH). Several jurisdictions in the region which are considered disadvantaged communities (DACs) on the basis of access to opportunity measures (described further in the RHNA methodology document), but which also score highly in job and transit access, may have their total RHNA allocations capped based on their long-range (2045) household forecast. This additional housing need, referred to as residual, is then reallocated to non-DAC jurisdictions in order to ensure housing units are placed in higher-resourced communities consistent with AFFH principles. This reallocation is based on the job and transit access measures described above, and results in an additional 130 units assigned to the City of La Mirada.

Please note that the above represents only a partial description of key data and calculations in the RHNA methodology.



**Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form**  
*All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.*  
*Appeals and supporting documentation should be submitted to [housing@scag.ca.gov](mailto:housing@scag.ca.gov).*  
*Late submissions will not be accepted.*

Date:  
10/26/20

Jurisdiction Subject to This Appeal Filing:  
*(to file another appeal, please use another form)*  
City of La Mirada

Filing Party (Jurisdiction or HCD)  
City of La Mirada

Filing Party Contact Name  
Gabriel Bautista

Filing Party Email:  
gbautista@cityoflamirada.org

**APPEAL AUTHORIZED BY:**

Name: Jeff Boynton

**PLEASE SELECT BELOW:**

- Mayor
- Chief Administrative Office
- City Manager
- Chair of County Board of Supervisors
- Planning Director
- Other: \_\_\_\_\_

**BASES FOR APPEAL**

- Application of the adopted Final RHNA Methodology for the 6<sup>th</sup> Cycle RHNA (2021-2029)
- Local Planning Factors and/or Information Related to Affirmatively Furthering Fair Housing (See Government Code Section 65584.04 (b)(2) and (e))
  - Existing or projected jobs-housing balance
  - Sewer or water infrastructure constraints for additional development
  - Availability of land suitable for urban development or for conversion to residential use
  - Lands protected from urban development under existing federal or state programs
  - County policies to preserve prime agricultural land
  - Distribution of household growth assumed for purposes of comparable Regional Transportation Plans
  - County-city agreements to direct growth toward incorporated areas of County
  - Loss of units contained in assisted housing developments
  - High housing cost burdens
  - The rate of overcrowding
  - Housing needs of farmworkers
  - Housing needs generated by the presence of a university campus within a jurisdiction
  - Loss of units during a state of emergency
  - The region's greenhouse gas emissions targets
  - Affirmatively furthering fair housing
- Changed Circumstances (Per Government Code Section 65584.05(b), appeals based on change of circumstance can only be made by the jurisdiction or jurisdictions where the change in circumstance occurred)

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_ Hearing Date: \_\_\_\_\_ Planner: \_\_\_\_\_

**Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form**  
*All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.*  
*Appeals and supporting documentation should be submitted to [housing@scaq.ca.gov](mailto:housing@scaq.ca.gov).*  
*Late submissions will not be accepted.*

**Brief statement on why this revision is necessary to further the intent of the objectives listed in Government Code Section 65584 (please refer to Exhibit C of the Appeals Guidelines):**

Please include supporting documentation for evidence as needed, and attach additional pages if you need more room.

La Mirada has been completely developed since the 1960s. La Mirada is fully urban with very few remaining vacant and underutilized properties in the City. The great majority of land in the City is currently devoted to residential land uses. Of the City's 3,841 acres, residential uses account for 2,264 acres or approximately 60% of the City's total land area. The remainder of the land area found within the City's corporate boundaries includes commercial uses, industrial uses, parks, schools, and other non-residential-related development. New residential development approaching some 2,000 housing units would require the wholesale elimination of substantial areas of existing non-residential development (commercial and industrial) that currently provides the only source of jobs and the major source of revenue for the City. The only existing sources of open space in the City include the County owned and controlled parkland and recreation areas that are not under the land use control of the City of La Mirada. No vacant land for new residential development is presently available. (Please refer to attached letter dated October 26, 2020)

**Brief Description of Appeal Request and Desired Outcome:**

Revised 6th Cycle RHNA that reflects a realistic and achievable objective that will not lead to significant dislocation, land use conflicts, and environmental impacts. The 6th Cycle RHNA must be consistent with the City's General Plan buildout. (Please see attached letter dated October 26, 2020)

**Number of units requested to be reduced or added to the jurisdiction's draft RHNA allocation (circle one):**

Reduced   x              Added \_\_\_\_\_

**List of Supporting Documentation, by Title and Number of Pages**

(Numbers may be continued to accommodate additional supporting documentation):

1. Please refer to attached City letter dated October 26, 2020.
2. City of La Mirada 5th Cycle Housing Element
- 3.

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_ Hearing Date: \_\_\_\_\_ Planner: \_\_\_\_\_



**CITY OF LA MIRADA**  
DEDICATED TO SERVICE

13700 La Mirada Boulevard  
La Mirada, California 90638  
P.O. Box 82  
La Mirada, California 90637-082  
Phone: (562) 943-0131 Fax: (562) 943-146  
www.cityoflamirada.org

October 26, 2020

Southern California Association of Governments  
Housing Division  
818 West Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, California 90017

**SUBJECT: REVIEW AND APPEAL TO THE 6TH CYCLE REGIONAL HOUSING NEEDS ALLOCATION (RHNA) FOR THE CITY OF LA MIRADA. CITY OF LA MIRADA**

Sir/Madam:

The purpose of this letter is to provide your agency with a formal request (appeal) to reconsider the 6<sup>th</sup> Cycle Regional Housing Needs Assessment (RHNA) figures that have been assigned to our City. La Mirada has been assigned significantly large RHNA numbers both for this cycle and the same was true for a previous cycle. For a previous cycle, the City's assigned RHNA was 1,751 units including 452 units for extremely low and very low income households, 280 units for low income households, 303 units for moderate income households, and 716 units for above moderate income households. For the current 6<sup>th</sup> Cycle RHNA, the City's assigned RHNA is 1,957 units including 633 units for extremely low and very low income households, 341 units for low income households, 319 units for moderate income households, and 664 units for above moderate income households. The RHNA for the current and the previous RHNA cycles called for a total of 3,709 housing units. Assuming a current average household size of 3.21 persons per unit taken from the most recent U. S. Census American Community Survey, this additional 3,709 housing units would translate into a population increase of nearly 12,000 new residents.

La Mirada was incorporated 1960 and at that time, the City's population was 22,000 persons. Since its incorporation in 1960, La Mirada's population grew by more than 128.7%, from 22,000 residents in 1960 to over 50,000 persons in the mid 2000's. The City's population increased 40% during the 1960s to 30,808 persons in 1970. The 1970's saw continued growth with the population increasing to 40,986 by 1980. The majority of this growth in population, between 1970 and 1980, could be attributed to the annexation of unincorporated areas within the City's designated *sphere of influence*. The 1980's actually saw a slowing in the City's population growth rate with a decline in the overall population being registered between 1980 and 1990. Population growth resumed once again during the 1990s with the 2000 Census counting 46,783 residents continuing to just over 50,000 in 2008. During the second decade of this century, the City's population either stabilized or exhibited a slight decline to 48,183. It is important

to note, that between 1980 and 2020, the City's population grew by 7,197 persons during the past 40 years. More importantly, the 6<sup>th</sup> Cycle RHNA assumes that this 40 years of population growth will be nearly matched in just eight years between 2021 and 2029 (1,957 units times 3.21 [the average household size] with a resulting population increase of 6,283).

La Mirada is very concerned that outside regional agencies clearly do not understand the many constraints facing the City that will limit potential new development in coming years, especially as it related to the construction of an addition 1,957 new housing units in the next six years remaining of the 6<sup>th</sup> Cycle RHNA. La Mirada has been completely developed since the 1960s. La Mirada is fully urban with very few remaining vacant and underutilized properties in the City. The great majority of land in the City is currently devoted to residential land uses. Of the City's 3,841 acres, residential uses account for 2,264 acres or approximately 60% of the City's total land area. The remainder of the land area found within the City's corporate boundaries includes commercial uses, industrial uses, parks, schools, and other non-residential-related development.

New residential development approaching some 2,000 housing units would require the wholesale elimination of substantial areas of existing non-residential development (commercial and industrial) that currently provides the only source of jobs and the major source of revenue for the City. The only existing sources of open space in the City include the County owned and controlled parkland and recreation areas that are not under the land use control of the City of La Mirada and are restricted by the state to remain parkland. No vacant land for new residential development is presently available. In fact, any future residential development will be limited to infill development that involves the replacement of either non-residential uses with new housing or the construction of higher density housing on lots containing lower density housing. Since the majority of the residential development is in sound condition, the opportunities for new replacement housing are severely limited.

Unlike many communities in Southern California, the great majority of land in the City is currently devoted to residential land uses. Of the City's 3,841 acres, residential land uses account for 2,264 acres or approximately 60% of the City's total land area. Assuming an average development density of 15 units per acre which corresponds to the City's Medium Density Residential land use designation, a total of 131-acres of land would be required to accommodate the required 1,957 housing units called for in the RHNA assuming that all of the new residential development would correspond to the Medium Density Residential land use designation. At the highest permitted development density (High Density Residential) of 28 units per acre, a total of 70 acres would be required. Again, this latter figure assumes that all of the 1,957 units would correspond to the High Density Residential land use designation. In any event, the land area required to accommodate the RHNA housing units far exceeds the City's current available land

supply of either vacant or underutilized land. This underscores the significant loss of existing housing units associated with any new infill housing development.

SCAG has taken the initiative in identifying our housing need up to 2029 (1,957 units). We respectfully request that SCAG reconsider this 6<sup>th</sup> Cycle RHNA as it applies to the City of La Mirada for the following reasons:

- Since all of these new units must be provided through the private sector, we question the methodology SCAG utilized in the development of the City's 6<sup>th</sup> Cycle RHNA. It appears the methodology used was a regionally based model such as a *shift-share model* where the estimated need was broadly assigned across the region. This approach does not take into account the number of key variables that must realistically be considered in evaluating the feasibility of developing nearly 2,000 new housing units over the next six years.
- Any future RHNA must reflect real demographic trends. SCAG has failed to demonstrate or provide a nexus between a realistic population and housing projection for the City of La Mirada and the RHNA. As we have indicated, the City's population growth has been relatively stable or has actually declined in recent decades due to declines in natural population increases (birth rates/death rates) and in-migration. In fact, the demographic transition that the City has experienced in recent decades is underscored by the significant student enrollment declines that the local Norwalk-La Mirada Unified School District has experienced in recent years.
- Any future RHNA must reflect real land use planning. The City respectfully requests SCAG identify the location and extent of where these additional 2,000 housing units for the 6<sup>th</sup> Cycle would be located. In years past, SCAG actually reviewed General Plan land use maps to ascertain a City's carrying capacity which does not appear to have been done for La Mirada.
- The area's housing characteristics that are unique in the City, such as student housing at Biola University do not appear to have been considered in the formulation of the RHNA.
- The majority of the City's neighborhoods would require major water and sewer upgrades to accommodate the new infill development that would total approximately 2,000 new units. How would this new infrastructure be financed in such a relatively short period of time (assuming a six year time frame for implementation). The existing infrastructure is unable to support the water and wastewater requirements of the existing and previous RHNA.

Should you have any questions regarding this appeal please feel free to contact me via email at: [gbautista@cityoflamirada.org](mailto:gbautista@cityoflamirada.org).

Thank you,

**CITY OF LA MIRADA**



Gabriel Bautista  
Community Development Director



---

# CITY OF LA MIRADA HOUSING ELEMENT 2014-2021



LEAD AGENCY:

CITY OF LA MIRADA  
COMMUNITY DEVELOPMENT DEPARTMENT  
13700 LA MIRADA BOULEVARD  
LA MIRADA, CALIFORNIA 90638

ADOPTED BY RESOLUTION No. 14-05

FEBRUARY 11, 2014







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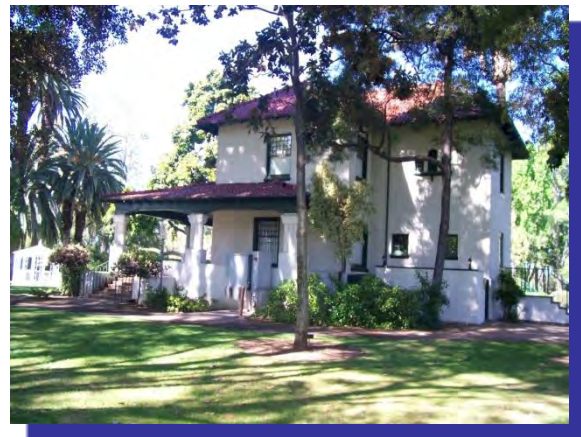
## SECTION 1.0 INTRODUCTION TO THE ELEMENT

### 1.1 OVERVIEW OF LA MIRADA

The City of La Mirada is located in the easternmost portion of Los Angeles County and is centrally located within the larger Los Angeles urban region. La Mirada is located approximately 16 miles southeast of downtown Los Angeles and 12 miles northwest of Santa Ana.<sup>1</sup> The City is completely surrounded by urban development and is bounded by unincorporated Los Angeles County on the north, La Habra and Fullerton on the east, Buena Park and Cerritos on the south, and Santa Fe Springs on the west. **The City's location in a regional context is illustrated in Exhibit 1. The City's location in relation to the surrounding communities is illustrated in Exhibit 2.**

La Mirada is fully urban with very few remaining vacant and underutilized properties in the City. La Mirada is suburban in character with approximately 49,000 residents living in the City's 7.78 square miles. **The great majority of land in the City is currently devoted to residential land uses. Of the City's 3,841 acres, residential uses account for 2,264 acres or approximately 60% of the City's total land area.** The remainder of the land area found within the City's corporate boundaries includes commercial uses, industrial uses, parks, schools, and other non-residential-related development.<sup>2</sup>

The City's land use and development patterns largely reflect its suburban character. While, residential neighborhoods make up the majority of the City's land area, commercial uses are concentrated at nodes located at key intersections such as Imperial Highway and Valley View Avenue, Imperial Highway and La Mirada Boulevard, Imperial Highway and Santa Gertrudes Avenue, La Mirada Boulevard and Rosecrans, and Beach Boulevard and Rosecrans Avenue. There is also a concentration of commercial uses that extend along the Santa Ana Freeway corridor. Industrial uses are located exclusively in the southern portion of the City.



La Mirada's land use patterns reflect the careful planning that has occurred since incorporation. Commercial uses are concentrated at key intersections. Industrial uses are well segregated from land uses that would be sensitive to traffic, noise, and other environmental effects associated with industry and they are located near rail and freeway facilities. Schools, parks, and other public facilities are centrally located in the residential neighborhoods to better serve the community's residents. **The City's development patterns promote land use compatibility and there are few areas where land use incompatibilities are present. More significantly, there is a complete lack of strip commercial development along the major**

<sup>1</sup> Google. Google Earth. 2005

<sup>2</sup> City of La Mirada. *City of La Mirada General Plan (Land Use Element)*. March 25, 2003



roadways **unlike the neighboring cities. Residential neighborhoods are found along the City's major arterials; Rosecrans Avenue, La Mirada Boulevard, Imperial Highway, Santa Gertrudes Avenue, and even Beach Boulevard.** In neighboring cities, strip commercial development extends along these roadways for many miles. Land use and development patterns in La Mirada are illustrated in Exhibit 3.

Throughout this Housing Element are photographs of the City's residential areas. The ir purpose is to provide the reader with a visual description of the various housing types that comprise the City's numerous and diverse residential areas.

## 1.2 HOUSING ELEMENT REQUIREMENTS

In 1967, the California Legislature made it mandatory for each county and general law city in the State to include a housing element as part of their adopted general plans. Section 65302(c) of the Government Code indicates that the housing element shall consist of "standards and plans for the improvement of housing and for the provision of adequate sites for housing." The housing elements must also "make adequate provision for the housing needs of all segments of the community." This legislation further states that housing elements shall be prepared in accordance with guidelines promulgated by the State Department of Housing and Community Development (HCD). The State requires that housing elements include an evaluation of the local housing characteristics, including an analysis of the capacity of the existing housing supply to provide all economic segments of the community with decent housing. In addition, the housing element must include a comprehensive program that consists of plans, policies, and programs that will be effective in addressing unmet needs.

The Southern California Association of Governments (SCAG) has the responsibility for developing the future housing need projections for each City in Southern California. The primary variable affecting the **City's ultimate housing need figure was the projected household growth. This household growth figure, in turn, was derived from Regional Transportation Plan (RTP) projections for the various jurisdictions.** The government code is very specific as to the variables that must be considered in the development of growth forecasts for the individual jurisdictions. The variables that were used by SCAG in the development of growth projections for La Mirada included the following:

- The relationship of the existing and projected jobs and housing for the City;
- The availability of water and other infrastructure to meet existing and future demand;
- The availability of land suitable for new residential development;
- The ability of public transportation and the existing roadway system to accommodate projected demand resulting from increased traffic from new residential development; and,
- The housing needs generated by the presence of a private university or college campus (in this case, Biola University).



The aforementioned future housing need developed for the City by the SCAG is referred to as the *Regional Housing Needs Assessment* or *RHNA*. The RHNA for La Mirada totals 235 units. The RHNA allocation that is applicable to the City of La Mirada includes the following:

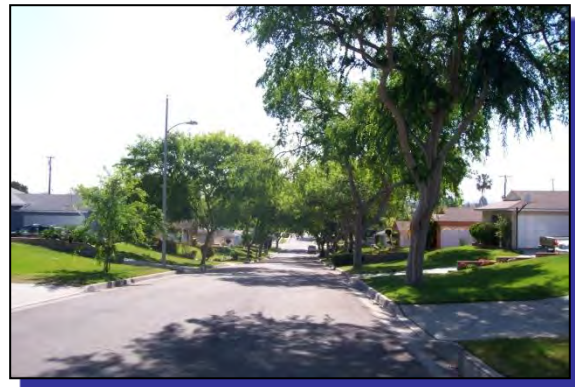
- A total of 62 units are assumed to be allocated to households with annual incomes that are considered to be *very low income* (50% or less of the County median household income);
- A total of 37 units are allocated to households with annual incomes that are *low income* (51% to 80% of the County median household income);
- A total of 40 units for *moderate income* households (81%-120% of the County median); and,
- A total of 96 units for *above moderate income* households (above 120% of the County median).

The City is required to ensure that the General Plan and Zoning Ordinance provides for this development. The Imperial Highway Corridor Specific Plan and sites that were rezoned in the Citywide housing infill program as part of the implementation of the 2006-2014 Housing Element are important elements of the City’s strategy to accommodate its housing RHNA of 235 housing units.

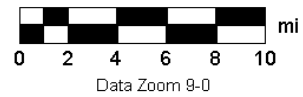
### 1.3 ORGANIZATION OF ELEMENT

This Housing Element builds upon housing policy that was adopted as part of the previous La Mirada Housing Element. The Housing Element consists of the following sections:

- *Introduction* – This section of the Housing element provides an overview of the City and indicates the statutory authority of the element.
- *Overview of La Mirada* – The requisite technical analysis required by the State of California is included in the section and includes detailed demographic, housing, and socio-economic characteristics.
- *Constraints to Housing Development* – Those factors that could inhibit the development of new housing in the future are detailed in this section. The Housing Plan’s policies and programs focus on strategies that will be effective in removing the identified constraints.
- *Housing Plan* – This section includes the policies and implementing programs that will enable the City to accommodate its projected housing need.

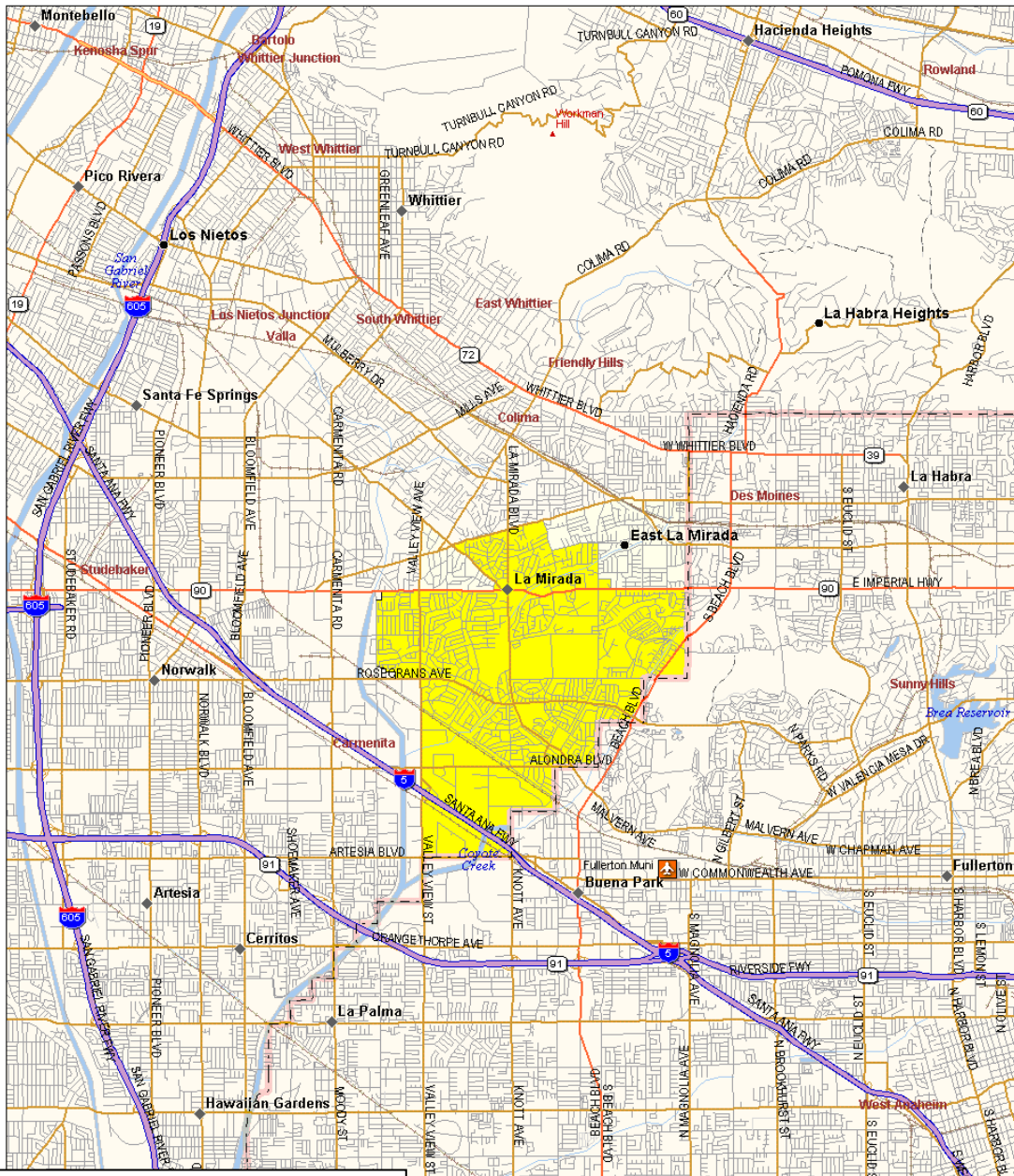



Detailed information regarding potential residential development sites along with a copy of the City’s current development permit fees is included in the Appendices.

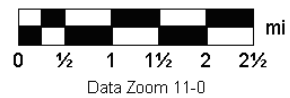


**EXHIBIT 1**  
**REGIONAL LOCATION OF LA MIRADA**  
SOURCE: DELORME

Attachment: City of La Mirada 2013-2021 Housing Element (Appeal of the Draft RHNA Allocation for the City of La Mirada)

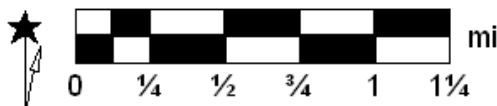
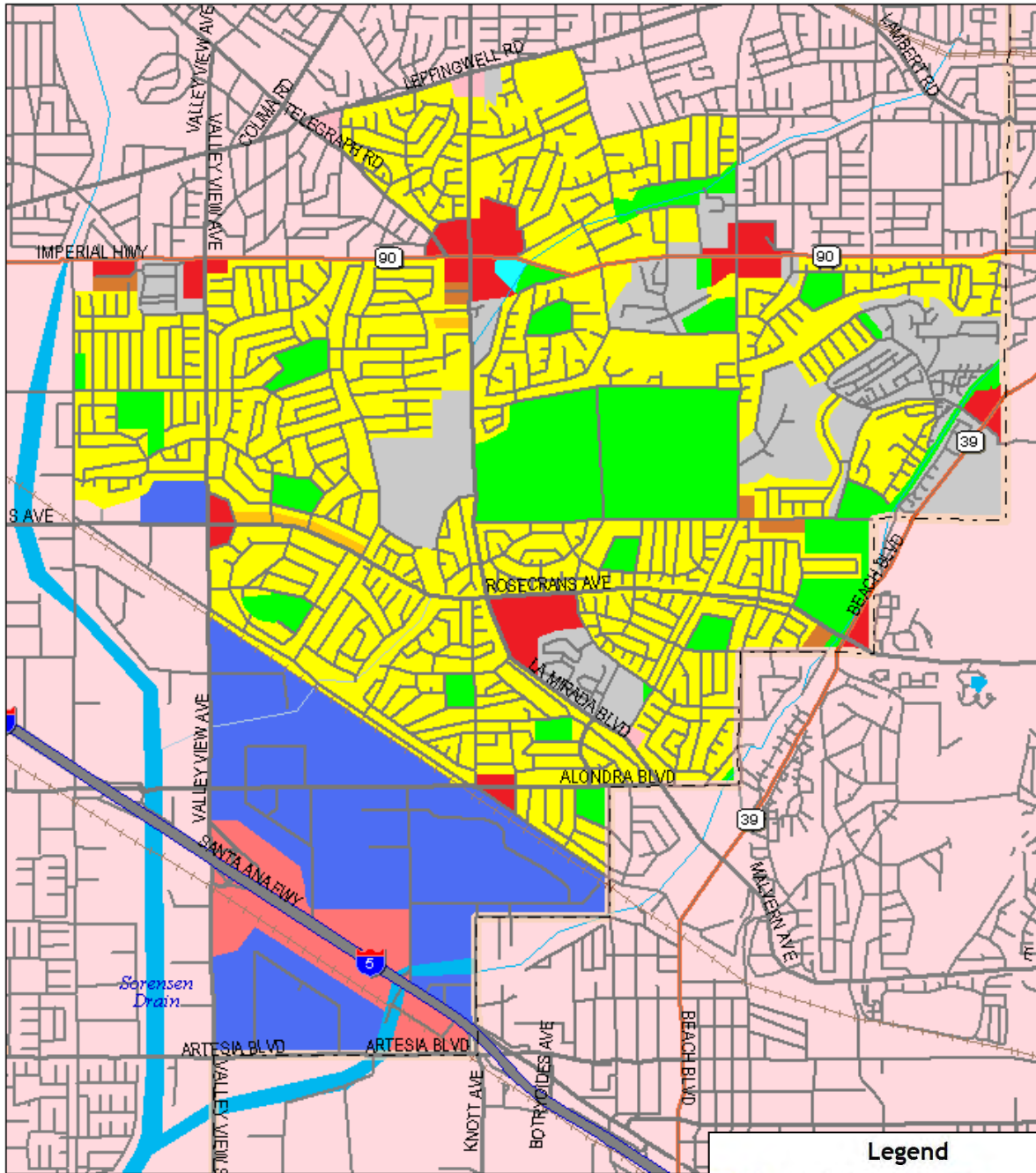


 City of La Mirada



**EXHIBIT 2**  
**VICINITY MAP OF THE LA MIRADA**  
SOURCE: DELORME

Attachment: City of La Mirada 2013-2021 Housing Element (Appeal of the Draft RHNA Allocation for the City of La Mirada)



| Legend |                            |
|--------|----------------------------|
| Yellow | Single-Family Residential  |
| Orange | Medium Density Residential |
| Red    | High Density Residential   |
| Cyan   | Administrative Office      |
| Blue   | Industrial                 |
| Pink   | Neighborhood Commercial    |
| Red    | Freeway Commercial         |
| Red    | General Commercial         |
| Grey   | Planned Unit Development   |
| Grey   | Specific Plan              |
| Green  | Open Space                 |

### EXHIBIT 3 LA MIRADA LAND USE AND DEVELOPMENT PATTERNS

SOURCE: DELORME

Attachment: City of La Mirada 2013-2021 Housing Element (Appeal of the Draft RHNA Allocation for the City of La Mirada)





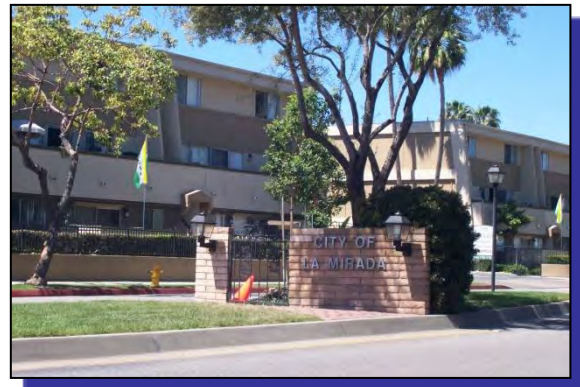
## 1.4 RELATIONSHIP TO OTHER GENERAL PLAN ELEMENTS

The California Government Code requires internal consistency among the various elements of a general plan. Section 65300.5 of the Government Code states that the general plan and the individual elements shall be integrated and internally consistent. Although the Housing Element presents basic policies and actions for resolving a variety of local housing issues, its implementation will be aided through the City's Zoning Ordinance, Subdivision Ordinance, Building Codes, and Code Enforcement Program.

As part of this Element's implementation, the City will undertake an annual review of its General Plan as required by State law.

## 1.5 PUBLIC PARTICIPATION

In accordance with Article 10.6 of the Government Code, the preparation of a local housing element must include a citizen participation process and this process must be documented. The key elements of the public participation process completed as part of this Housing Element Update are summarized below.



- **Community Workshop.** The City held a community workshop on the Housing Element, open to the public, on October 28, 2013. The City distributed flyers and posted information on its website about the workshop. Additionally, the City distributed public notices in the local newspaper (Lamplighter) and provide flyers to local service providers, as shown in Appendix B. However, no members of the public attended.
- **Public Review of the Preliminary Draft Housing Element.** The City made available draft Housing Element on the City's website so the public would have an opportunity to review and comment on the draft Housing Element. In addition, the Draft was made available during public workshops.
- **Coordination with Local Housing Service Providers.** The City contacted key social service providers and public agencies involved in providing housing services to inform them that the draft Housing Element is available for review and ask for input, as shown in Appendix B.
- **Planning Commission/City Council Public Hearings.** Once the Department of Housing and Community Development completed the review of the Housing Element draft, the City held public hearings before the Planning Commission and City Council as part of its adoption. These hearings, along with the environmental review, provide additional opportunities for public input.
- **Adoption of the Housing Element.** Once adopted, the certified Housing Element will be placed on the City's website and transmitted to applicable agencies.





## SECTION 2.0 PROFILE REPORT

### 2.1 INTRODUCTION

This section of the La Mirada Housing Element provides an overview of the demographic, housing, and socioeconomic characteristics of the City. This section considers the following:

- *Population Characteristics* describes population growth trends in the City, the age characteristics of the City's residents, and their ethnicity.
- *Housing Characteristics* focuses on historic trends in residential development, housing unit types, housing tenure, and housing condition.
- *Socioeconomic Characteristics* outlines household income and other household characteristics and provides an overview of the key socioeconomic indicators related to housing policy.
- *Special Needs Groups* describes "special needs" housing for those households with special needs (i.e., handicapped, elderly, etc.).

The information used in this analysis was obtained from a variety of sources, including the United States Bureau of the Census, the State of California Department of Finance (DOF), the State of California Employment Development Department (EDD).

The U.S. Bureau of the Census undertakes a census every ten years. In addition, the Bureau of the Census conducts the American Community Survey (ACS) in between the decennial census in order to obtain more detailed demographic and housing information. The DOF provides population and housing estimates for individual cities and counties throughout California on an annual basis. The DOF figures are different from those derived from the Census in that the former are estimates. The DOF data provides useful and generally accurate population and housing estimates for those intervening years between the census surveys. Finally, the EDD provided employment information used in this analysis.

### 2.2 DEMOGRAPHIC CHARACTERISTICS

To effectively determine the present and future housing needs of the City of La Mirada, certain demographic characteristics must be considered. These variables include population growth trends, ethnicity, population age characteristics, and trends in average household size.

#### 2.2.1 POPULATION TRENDS

The City of La Mirada was incorporated as a general law city on March 23, 1960. **The City's population** at the time of incorporation was 22,000 persons. Key findings related to demographic trends in the City are summarized below:



- Since its incorporation in 1960, La Mirada’s **population** has grown 122.4 percent, from 22,000 residents in 1960 to 48,930 persons according to the 2013 DOF estimates. The City experienced the greatest growth in its first two decades.
- As was the case in many suburban Los Angeles communities, La Mirada shared in the population boom of World War II. The population increased 40 % during the 1960s to 30,808 persons in 1970.
- The 1970’s saw continued growth (31%), with the population growing to 40,986 by 1980. The majority of growth in population, between 1970 and 1980, may be attributed to the annexation of **unincorporated areas within the City’s designated *sphere of influence***.
- The **1980s actually saw a slowing in the City’s population** growth where a decline in the overall population was registered between 1980 and 1990.
- Population growth resumed once again during the 1990s with the 2000 Census counting 46,783 residents. According to the most recent (January 2013) **DOF estimates, the City’s population was 48,930 persons.**

The City’s historic population trends are shown in Table 1 and Exhibit 4.

| Table 1<br>Population Growth in the City of La Mirada 1970-2013 |        |       |      |        |       |
|---|--------|-------|------|--------|-------|
| Year  | Pop.   | %Δ    | Year | Pop.   | %Δ    |
| 1970  | 30,808 | --    | 1992 | 42,450 | 1.8%  |
| 1971  | 30,750 | -0.2% | 1993 | 42,750 | 0.7%  |
| 1972  | 31,250 | 1.6%  | 1994 | 43,050 | 0.7%  |
| 1973  | 30,950 | -1.0% | 1995 | 43,600 | 1.3%  |
| 1974  | 31,100 | 0.5%  | 1996 | 43,700 | 0.2%  |
| 1975  | 37,850 | 21.7% | 1997 | 44,050 | 0.8%  |
| 1976  | 38,350 | 1.3%  | 1998 | 45,150 | 2.5%  |
| 1977  | 38,500 | 0.4%  | 1999 | 45,550 | 0.9%  |
| 1978  | 38,400 | -0.3% | 2000 | 46,783 | 2.7%  |
| 1979  | 41,450 | 7.9%  | 2001 | 47,351 | 1.2%  |
| 1980  | 40,986 | -1.1% | 2002 | 47,956 | 1.3%  |
| 1981  | 40,500 | -1.2% | 2003 | 48,924 | 2.0%  |
| 1982  | 40,400 | -0.2% | 2004 | 50,066 | 2.3%  |
| 1983  | 40,400 | 0.0%  | 2005 | 50,188 | 0.2%  |
| 1984  | 40,400 | 0.0%  | 2008 | 50,092 | -0.2% |



| Table 1<br>Population Growth in the City of La Mirada 1970-2013 |        |       |                          |        |       |
|---|--------|-------|--------------------------|--------|-------|
| 1985  | 40,450 | 0.1%  | 2009                     | 48,434 | -3.3% |
| 1986  | 40,650 | 0.5%  | 2010                     | 48,527 | 0.2%  |
| 1987  | 40,550 | -0.2% | 2011                     | 48,608 | 0.2%  |
| 1988  | 40,250 | -0.7% | 2012                     | 48,720 | 0.2%  |
| 1989  | 40,000 | -0.6% | 2013                     | 48,930 | 0.4%  |
| 1990  | 40,452 | 1.1%  | Change from 1970 to 2013 | 18,122 | 58.8% |
| 1991  | 41,700 | 3.1%  |                          |        |       |

Source: State of California Dept. of Finance. U.S. Bureau of the Census.



**EXHIBIT 4**  
**POPULATION TRENDS IN THE CITY OF LA MIRADA**  
 SOURCE: U. S. CENSUS AND CALIFORNIA DEPARTMENT OF FINANCE



Two key variables influenced the growth of the City’s population: immigration and natural increase. Local population growth resulting from immigration was directly affected by new housing construction (new residents moved in to the City to occupy the recently constructed units). Population growth due to natural increases is a function of a local population’s birth, death, and fertility rates and will affect the average household size. Both variables have contributed to the City’s population growth.

According to the 1980 U.S. Census, there were 6,836 housing units in the City. In 1990, the U.S. Census counted 6,680 housing units, a decline of 156 units in the ten year period between 1980 and 1990. During this same period, the City’s population grew by 6,083 persons. As is evident from the examination of the historical data, the greatest component of population growth in the City during the past decades was related to natural population increase and the resulting increases in the average household size.

**2.2.2 AGE CHARACTERISTICS**

As indicated previously, the distribution of changes in the population by age group is an important factor in determining the general population makeup and possible future housing needs. The population of La Mirada has matured over the past decades. The median age for the community has increased from 23.3 years in 1970, to 29.2 years in 1980, to 32.2 years in 1990. The median age of the City’s population increased further to 35.4 years of age in 2000 and 37.9 in 2010. Table 2 indicates the overall age characteristics of the City’s population.

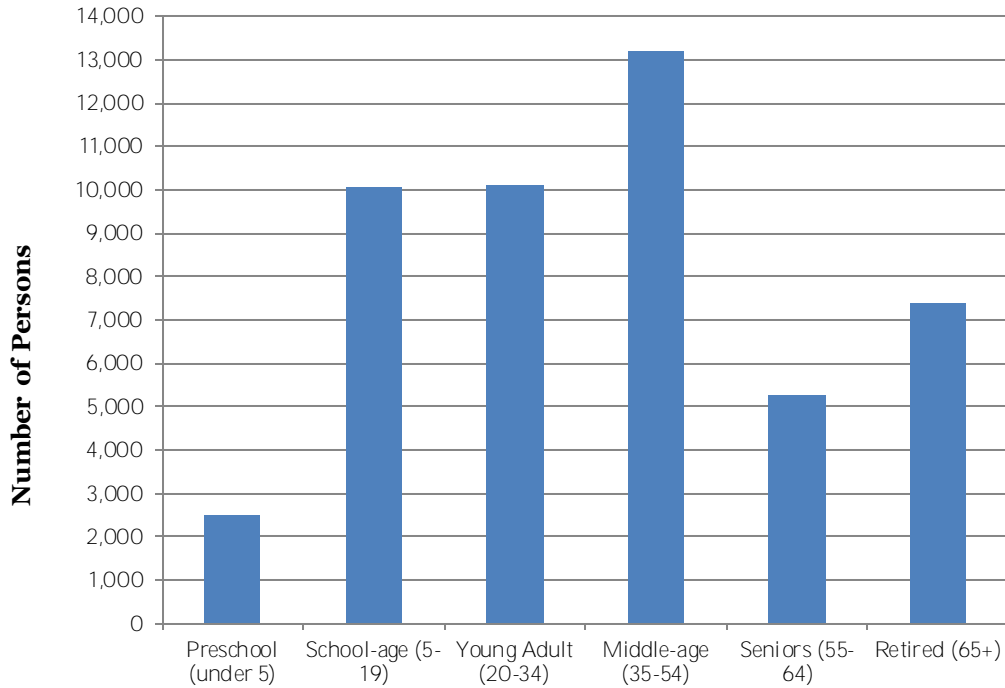
| Table 2<br>Age Characteristics of Population, 2010 |           |           |
|--|-----------|-----------|
| Age  | # Persons | % Persons |
| under 5 years of age                               | 2,488     | 5.1%      |
| 5-9 years of age                                   | 2,641     | 5.4%      |
| 10-14 years of age                                 | 3,022     | 6.2%      |
| 15-19 years of age                                 | 4,407     | 9.1%      |
| 20-24 years of age                                 | 4,780     | 9.9%      |
| 25-34 years of age                                 | 5,322     | 11.0%     |
| 35-44 years of age                                 | 6,287     | 13.0%     |
| 45-54 years of age                                 | 6,931     | 14.3%     |
| 55-64 years of age                                 | 5,272     | 10.9%     |
| 65-74 years of age                                 | 3,532     | 7.3%      |
| 75 & over years of age                             | 3,845     | 7.9%      |
| Source: U.S. Bureau of the Census. 2010, DP-1      |           |           |



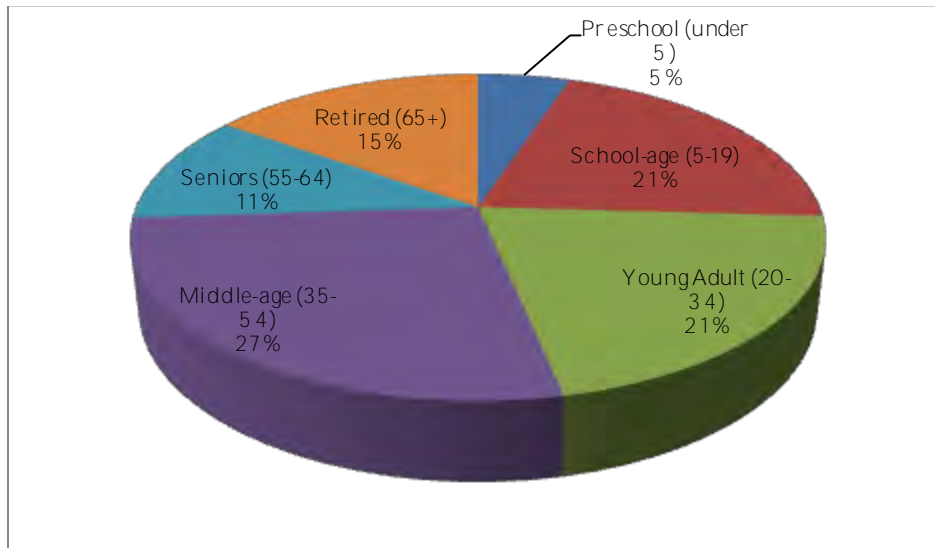
This dramatic change may be attributed to a number of factors including a decline in the number of households with children and an overall aging of the City’s population that is reflective of overall demographic trends. The age characteristics of the City’s population, summarized in Table 2, underscore the aging of La Mirada’s population. Approximately 26% of the City’s population is 19 years of age or younger and almost 26% of the population is 55 years of age or older.

The general overall maturity of the City’s population is also evidenced in the increased number of elderly persons 65 years of age or older. In 1970, persons 65 years of age or older accounted for 3% of the overall population. In 1980, the same group comprised 5% of the population. By 1990, the percentage of the population 65 years and older had increased to 11% of the population. According to the 2000 Census, the percentage of the City’s population that was 65 years of age or older increased to almost 14%. As of 2010, the elderly population comprises 15.2% of the total population. Census data reformatted in Table 3 depicts the age statistics provided in Table 2 according to specific age categories (pre -school aged, school aged, young adults, etc.). Again, the majority of the City’s residents are over 35 years of age. The age characteristics of the City’s population are illustrated in Exhibit 5.

| Table 3<br>Population Age Characteristics, 2010 |           |           |
|---|-----------|-----------|
| Age Category                                    | # Persons | % Persons |
| Preschool (under 5)                             | 2,488     | 5.1%      |
| School-age (5-19)                               | 10,070    | 20.8%     |
| Young Adult (20-34)                             | 10,102    | 20.8%     |
| Middle-age (35-54)                              | 13,218    | 27.2%     |
| Seniors (55-64)                                 | 5,272     | 10.9%     |
| Retired (65+)                                   | 7,377     | 15.2%     |
| Total   | 48,527    | 100%      |
| Source: U.S. Bureau of the Census. 2010, DP-1   |           |           |



Age Category of City Residents - 2010



Age Distribution of City Residents - 2010

**EXHIBIT 5**  
**POPULATION AGE CHARACTERISTICS OF LA MIRADA RESIDENTS**  
 SOURCE: U. S. CENSUS, 2010

Attachment: City of La Mirada 2013-2021 Housing Element (Appeal of the Draft RHNA Allocation for the City of La Mirada)





### 2.2.3 ETHNICITY OF CITY RESIDENTS

Table 4 indicates the ethnic and racial composition of the City that was identified in the most recent Census. As indicated in the table, approximately 61% of the City’s residents were classified as white. Asians accounted for approximately 18% of the City’s total population and appeared to be the largest racial minority group in terms of actual numbers. According to the 2010 Census data, Hispanic persons accounted for just over 39.7% of the City’s total population.

| Table 4<br>Race and Ethnicity in La Mirada, 2010   |           |       |
|--|-----------|-------|
| Race/Ethnicity   | # Persons | %     |
| White  | 29,462    | 60.7% |
| Asian  | 8,650     | 17.8% |
| African-American   | 1,099     | 2.3%  |
| American Indian  | 394       | 0.8%  |
| Pacific Islander   | 142       | 0.3%  |
| Other Races  | 8,780     | 18.0% |
| Hispanic (1)   | 19,272    | 39.7% |
| Source: U.S. Bureau of the Census, 2010, DP-1<br>Notes: (1) Hispanic origin is an ethnicity that can be present in other races. 39.7% of La Mirada population is of Hispanic Origin and may be included in other census-defined race categories. |           |       |

### 2.2.4 HOUSEHOLD SIZE

Household size is an important indicator in natural population increase as opposed to immigration associated with new housing construction. A community can experience significant and dramatic increases in population solely due to increased household size. Over the past four decades, the average household size in the City experienced a decline from 3.9 persons per unit in 1970 to 3.42 persons per unit in 1980, with a further decline to an average of 3.05 persons per unit reported in the 1990 Census. The 2000 Census indicated the City’s average household size increased slightly to 3.1 persons per unit and remained stable at 3.1 persons per unit reported in the 2010 Census. The most recent DOF estimates (January 1, 2013) indicated a further increase in the average household size to 3.14 persons per unit (the average household size for the County as a whole was 3.00 persons per unit).



There is a difference in the average household size for the owner-occupied units in the City and the rental

units. In the 2011 ACS, the average household size for owner-occupied units was 3.21 persons per household compared to 3.23 persons per household for the renter occupied units. According to the 2011 ACS there were 36,407 residents living in owner occupied units and 9,785 persons living in rental units. The same ACS figures indicated there were 11,332 owner-occupied units and 3,029 rental units in the City in 2011.



## 2.3 HOUSING CHARACTERISTICS

### 2.3.1 HOUSING CHARACTERISTICS

According to the 2011 ACS, there were 14,820 housing units in the City. Of this total, 11,802 units (79.6%) were single-family detached units; 829 housing units (5.6%) were single-family attached units; 270 units (1.8%) were smaller multiple-family developments containing between two to four units per structure; and 1,787 units (12.1%) were included in larger multi-family developments containing five or more units per structure. Finally, the ACS identified 132 mobile homes in the City.

According to the most recent DOF estimates, there were 15,093 housing units in the City in January 2013. Of this total, 12,084 units (80.1%) were classified as single-family detached units. Single-family attached housing totaled 762 units (5.0% of the City total), and smaller multiple-family developments containing between two to four units totaled 288 units or 1.9%. Table 5 compares the 2011 ACS data with the 2013 DOF estimates for the City.

| Table 5<br>Type of Housing Stock, 2013                             |          |        |          |       |
|--|----------|--------|----------|-------|
| Unit Type  | 2011 ACS |        | 2013 DOF |       |
|  | # Units  | %      | # Units  | %     |
| Single-Family Detached   | 11,802   | 79.6%  | 12,084   | 80.1% |
| Single-Family Attached   | 829      | 5.6%   | 762      | 5.0%  |
| 2-4 Units  | 270      | 1.8%   | 288      | 1.9%  |
| 5 + Units  | 1,787    | 12.1%  | 1,787    | 11.8% |
| Mobile Homes   | 132      | 0.9%   | 172      | 1.1%  |
| Total  | 14,820   | 100.0% | 15,093   | 99.9% |
| Source: ACS 2011, DP-4; State of California Dept. of Finance, 2013 |          |        |          |       |



### 2.3.2 HOUSING CONDITION

The age of a structure may have a significant effect on its physical condition. However, by itself, age is not a valid indicator of housing condition since proper care and continual maintenance will extend the physical and economic life of a unit. On the other hand, a lack of normal maintenance coupled with an aging housing stock can lead to the serious deterioration of individual units and entire neighborhoods. As indicated in Table 6, 8,137 units (54.9% of the City's housing) was constructed prior to 1960. Interestingly more than half of the City's housing was constructed between 1940 and 1959.

| Table 6<br>Age of La Mirada's Housing Stock, 2011 |        |                  |
|---|--------|------------------|
| Year  | Units  | % of Total Units |
| 2000-2011   | 295    | 2.0%             |
| 1990-1999   | 1,725  | 11.6%            |
| 1980-1989   | 732    | 4.9%             |
| 1970-1979   | 1,634  | 11.0%            |
| 1960-1969   | 2,297  | 15.5%            |
| 1940-1959   | 7,961  | 53.7%            |
| 1939 or earlier                                   | 176    | 1.2%             |
| Total   | 14,820 | 100%             |
| Source: ACS, 2011, DP-4                           |        |                  |

As part of the 2006-2014 Housing Element, a citywide field survey was conducted to ascertain the condition of housing in the local neighborhoods. Housing conditions were evaluated according to the following criteria:

- **Good Condition-Condition #1.** Units that did not appear to require rehabilitation were included in this category. Typically, improvements can be and are usually done by the property owner.
- **Moderate Repairs Condition #2.** This category includes those units that require some maintenance including paint and major repairs such as replacement of the roof. Typically, such repairs would be performed by a contractor.
- **Major Repairs Condition #3.** This category of housing condition requires extensive repairs and/or renovation. This housing condition category applies to those structures where the cost of repair is estimated to exceed the value of the structure.

Very few units overall were identified as requiring major rehabilitation. **Out of the City's entire housing inventory, only 18 units were identified as requiring rehabilitation (Condition #2) and only one unit was identified as requiring demolition. The relatively sound quality of this City's housing stock may be attributed to the significant increase in housing values in recent years. It was apparent during the surveys**

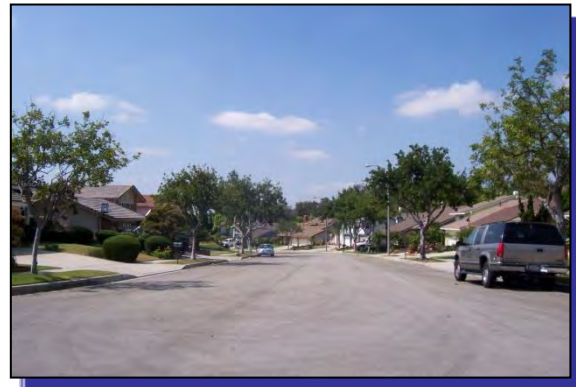


that many property owners had reinvested substantial sums of money into their properties. The increase in home values did have a beneficial impact in housing quality.

There are a number of other Census indicators that are useful in identifying potential dilapidated units. These indicators include units without heating, units lacking conventional plumbing, or units lacking complete kitchen facilities. The latter variable may also be an indicator of either units constructed illegally or legal second units. According to the 2011 ACS, 114 units (0.8% of the City's total) did not use any form of heating fuel. The data also indicated that 29 units (0.2%) lacked complete plumbing facilities. Finally, 72 units (0.5%) were identified as lacking complete kitchen facilities. According to the most recent 2011 ACS, the average household size for the owner-occupied units was 3.21 persons per unit and 3.23 persons per rental unit. The 2011 ACS, DP-4 indicates a lower average household size for Los Angeles County at 3.18 persons per owner-occupied unit and 2.81 persons per renter-occupied unit.

### 2.3.3 VACANCY RATE

The residential vacancy rate is a good indicator of the balance between housing supply and demand in a community. When the demand for housing exceeds the available supply, the vacancy rate will be low. A low vacancy rate, in turn, drives the cost of housing upward to the disadvantage of prospective buyers or renters. In a balanced housing market, the vacancy rate would range from 5% to 8%. In addition, a balanced housing market would consist of vacant units distributed among a variety of housing types, sizes, price ranges, and locations within the City. This allows adequate selection opportunities for households seeking new residences. The most recent DOF estimates indicated the City's vacancy rate was 2.7% as of January 2013. The vacancy rate for the County as a whole for that same period was 5.9%. This may indicate a higher demand for housing in La Mirada than in surrounding cities.



### 2.3.4 HOUSING TENURE

According to the 1970 U.S. Census, 86.3% of the housing units in the City were owner-occupied. The percentage of owner-occupied units in the City declined slightly to 82.4% according to the 1980 Census. The 1990 Census reported a further decline in the number of owner occupied units to 78.6%. The 2000 Census indicated an increase in the percentage of owner-occupied housing units to 82%. Finally, the 2011 ACS indicated a decline in owner-occupied housing units to 79% along with an increase of rental units to 21%. The 2011 ACS reported there were 11,332 owner occupied units and 3,029 renter occupied units in the City.

According to the most recent ACS, there were a total of 459 units in the City that were vacant. This figure accounted for approximately 3.1% of the total number of units in the City. Of this figure, 59 units (12.9%) were vacant rental units and 36 units (7.8%) were units that were classified as non-rental units that were privately owned or for sale. The remainder included vacant seasonal units or units that were rented or sold but not yet occupied.



### 2.3.5 HOUSING COST AND AFFORDABILITY

According to the 1980 Census, the median value of owner-occupied housing in La Mirada was \$83,700, which represented a 349% increase over the 1970 median value of \$24,000. By 1990 the median value of an owner occupied house had risen 148 %. The 2000 Census indicated the median home value in the City was \$210,700. According to the 2011 ACS, DP-4, the median home value was \$466,700, an increase of 121% over the year 2000. A breakdown of the value of owner occupied units is provided in Table 7.

| <b>Table 7<br/>Value of Owner-Occupied Units - 2011</b> |                     |          |
|---|---------------------|----------|
| <b>Value</b>  | <b>No. of Units</b> | <b>%</b> |
| Less than \$50,000                                      | 122                 | 1.1%     |
| \$50,000 - \$99,999                                     | 156                 | 1.4%     |
| \$100,000 – \$149,999                                   | 123                 | 1.1%     |
| \$150,000 - \$199,999                                   | 200                 | 1.8%     |
| \$200,000 – \$299,999                                   | 706                 | 6.2%     |
| \$300,000 – \$499,999                                   | 5,377               | 47.4%    |
| \$500,000 - \$999,999                                   | 4,607               | 40.7%    |
| \$1,000,000 or more                                     | 41                  | 0.4%     |
| Median Home Value                                       | 466,700             | --       |
| Source: ACS, 2011, DP-4                                 |                     |          |

According to Data Quick home sales statistics, a total of 48 homes were sold during the month of June 2013. The median home sales price was \$415,000. The median home sales price one year earlier (June 2012) was \$350,250. This represents a 15.60% rise in the median home sales price in the past year alone.

As shown in Table 8, the 2011 ACS DP-4 estimates the cost for rental housing for the City.

| <b>Table 8<br/>Cost of Renter-Occupied Units 2011</b> |                     |
|---|---------------------|
| <b>Monthly Rent</b>                                   | <b>No. of Units</b> |
| Less than \$200                                       | 10                  |
| \$200 - \$299   | 16                  |
| \$300 - \$499   | 40                  |
| \$500 - \$749   | 208                 |



| <b>Table 8<br/>Cost of Renter-Occupied Units 2011</b> |                     |
|---|---------------------|
| <b>Monthly Rent</b>                                   | <b>No. of Units</b> |
| \$750 - \$999   | 512                 |
| \$1,000 - \$1,499                                     | 899                 |
| \$1,500 or more                                       | 1,184               |
| No Cash Rent  | 160                 |
| Median Rent   | \$1,336             |
| Source:<br>ACS, 2011, DP-4                            |                     |

### 2.3.6 OVERPAYMENT FOR HOUSING

A household is considered to be overpaying for housing if it is paying 30% or more of its monthly income for housing. According to the 2011 ACS B25106, 4,262 housing units that were classified as owner-occupied paid 30% or more of their monthly income for housing. This figure represents 37.6% of the total owner-occupied housing units in the City. Renter-occupied housing units that were paying 30% or more of their monthly income for housing totaled 1,790 housing units or 59.0% of the total renter housing units in the City.

Table 9 indicates the income limits for extremely low income households, very low income households, and low income households for 2013. The income thresholds shown in the table indicate the income limits for various household sizes (between one person households up to households containing eight persons). As indicated in Table 9, the low income household income threshold in 2013 for a family of four is \$66,250.

| <b>Table 9<br/>Household Lower Income Limits (in dollars)</b> |                                   |                       |                  |
|---|-----------------------------------|-----------------------|------------------|
| <b>HH Size</b>  | <b>2013 HUD MFI</b>               |                       |                  |
|   | Extremely Low Income (30% of MFI) | Very Low (50% of MFI) | Low (80% of MFI) |
| 1   | 17,400                            | 29,000                | 46,400           |
| 2   | 19,900                            | 33,150                | 53,000           |
| 3   | 22,400                            | 37,300                | 59,650           |
| 4   | 24,850                            | 41,400                | 66,250           |
| 5   | 26,850                            | 44,750                | 71,550           |



| Table 9<br>Household Lower Income Limits (in dollars) |              |        |        |
|---|--------------|--------|--------|
| HH Size   | 2013 HUD MFI |        |        |
| 6   | 28,850       | 48,050 | 76,850 |
| 7   | 30,850       | 51,350 | 82,150 |
| 8   | 32,850       | 54,650 | 87,450 |
| Source: U. S. Dept. of Housing and Urban Development  |              |        |        |

The HCD now requires local governments to identify those households that have incomes that are classified as *extremely low income*. Extremely low income households are those households that have annual incomes less than 30% of the County median. The Households included in this category typically represent the lowest wage earners in a community with wages corresponding to the current annual minimum wage of \$8.00 per hour (as of January 1, 2013). The annual wage figure cited previously assumes full-time employment.

Table 10 provides a breakdown of housing affordability for the following income categories:

- *Very-Low* incomes refer to those household incomes that are 50% or less of the County median adjusted for household size;
- *Low* incomes refer to those household incomes that are between 51% and 80% of the County median adjusted for household size; and,
- *Moderate* incomes refer to those households that are between 81% and 120% of the County median household income adjusted for household size.

| Table 10<br>City of La Mirada Housing Affordability Standards (in dollars/month), 2013 |         |         |          |
|--|---------|---------|----------|
| Unit Type  | verylow | low     | moderate |
| <b>Owner-Occupied Units</b>  |         |         |          |
| Studio   | \$567   | \$794   | \$1,455  |
| 1 Bedroom  | \$648   | \$907   | \$1,663  |
| 2 Bedroom  | \$729   | \$1,021 | \$1,871  |
| 3 Bedroom  | \$810   | \$1,134 | \$12,079 |
| 4 Bedroom  | \$875   | \$1,225 | \$2,245  |



| <b>Table 10<br/>City of La Mirada Housing Affordability Standards (in dollars/month), 2013</b> |                 |            |                 |
|--|-----------------|------------|-----------------|
| <b>Unit Type</b>   | <b>very low</b> | <b>low</b> | <b>moderate</b> |
| <b>Renter-Occupied Units</b>   |                 |            |                 |
| Studio   | \$567           | \$680      | \$1,247         |
| 1 Bedroom  | \$648           | \$778      | \$1,426         |
| 2 Bedroom  | \$729           | \$875      | \$1,604         |
| 3 Bedroom  | \$810           | \$972      | \$1,782         |
| 4 Bedroom  | \$875           | \$1,050    | \$1,925         |
| Source: U. S. Dept. of Housing and Urban Development   |                 |            |                 |

The Comprehensive Housing Affordability Strategy (CHAS) data are used by HOME and CDBG jurisdictions to prepare their consolidated plans. Data showing housing problems and the availability of affordable housing are available through the CHAS website for all counties, places, and CDBG/HOME jurisdictions. The 2006-2010 CHAS data concerning overpayment for housing in the City of La Mirada is summarized below in Table 11. Table 11 indicates the overpayment for extremely low income households (<30% of the County median), very low income households (30% to 50% of the County median), low income households (50% to 80% of the County median), and all of the households in the City. The households that are overpaying for housing are further identified by tenure (owner-occupied and renter households). Finally, the table indicates senior households and large related households that are overpaying for housing.





**Table 11  
Overpayment For Housing in La Mirada**

| Household by Type, Income, & Overpayment | Renters |               |           |               | Owners |               |           |              | Total House holds |
|--|---------|---------------|-----------|---------------|--------|---------------|-----------|--------------|-------------------|
|  | Senior  | Large Related | All other | Total Renters | Senior | Large Related | All Other | Total Owners |                   |
| HH Income ≤30%                           |         |               |           |               |        |               |           |              |                   |
| % Cost Burden >30%                       | 385     | 80            | 50        | 695           | 360    | 0             | 55        | 770          | 1,465             |
| % Cost Burden >50%                       | 305     | 80            | 50        | 695           | 255    | -0            | 55        | 770          | 1,465             |
| HH Income >30% - ≤50%                    |         |               |           |               |        |               |           |              |                   |
| % Cost Burden >30%                       | 110     | 90            | 30        | 560           | 225    | 160           | 45        | 1,075        | 1,635             |
| % Cost Burden >50%                       | 90      | 65            | 15        | 560           | 145    | 140           | 45        | 1,075        | 1,635             |
| HH Income >50- ≤80%                      |         |               |           |               |        |               |           |              |                   |
| Cost Burden >30%                         | 35      | 80            | 70        | 650           | 265    | 210           | 30        | 1,730        | 2,380             |
| Cost Burden >50%                         | 25      | 40            | 0         | 650           | 100    | 70            | 30        | 1,730        | 2,380             |
| HH Income >80%                           |         |               |           |               |        |               |           |              |                   |
| % Cost Burden >30%                       | 60      | 4             | 35        | 905           | 139    | 320           | 120       | 8,090        | 8,995             |
| % Cost Burden >50%                       | 25      | 0             | 0         | 905           | 55     | 40            | 70        | 8,090        | 8,995             |

Source: 2006-2010 CHAS Data

**2.3.7 HOUSEHOLD SIZE AND OVERCROWDING**

The size of residential structures (number of rooms, excluding bathrooms, halls, closets, etc.) is an important factor in assessing whether the housing stock is adequately accommodating the community's population. An average-sized residential unit has five rooms (kitchen, dining room, living room and two bedrooms), according to the U.S. Census Bureau, and can accommodate a family of up to five without being considered overcrowded. A housing unit is considered to be overcrowded if it has more than one person per room. A housing unit is considered to be severely overcrowded if it contains 1.51 persons per room or greater. According to the 2011 ACS, 4.8% of the units were considered to be overcrowded while 4.7 % of the units were classified as being severely overcrowded. As indicated in Table 12, a total of 669 owner-occupied units were classified as overcrowded and 697 rental units were classified as being overcrowded.



**Table 12  
Overcrowded Units in 2011 in La Mirada  
(by Tenure)**

| Category  | Owner-Occupied | Rental |
|---|----------------|--------|
| Overcrowded Units (1.01-1.50 persons/room)-       | 499            | 191    |
| Severely Overcrowded Units (1.51 > persons/room)- | 170            | 506    |
| Total Overcrowded Units                           | 669            | 697    |
| Source: ACS, 2011.                                |                |        |

**2.3.8 AT RISK HOUSING**

The Government Code (Section 65583) requires the City to analyze the extent to which low income, multi-family rental units are at risk of becoming market rate. The multi-family units to be considered are any units that were constructed using various federal assistance programs, state or local mortgage revenue bonds, redevelopment tax increment funds, in-lieu fees or an exclusionary housing ordinance, or density bonuses. Low income, multi-family housing is considered to be at risk if it is eligible to convert to non-low income housing due to: 1) the termination of a rental subsidy contract; 2) mortgage prepayment; or 3) the expiration of affordability restrictions.

According to information compiled by the California Housing Partnership Corporation (CHPC), there are two at-risk housing developments that are located in La Mirada. La Mirada Vistas, a federally subsidized housing development for low-income seniors located on 14129 Adoree Street consists of 74 out of 75 units assisted under Section 8 and is considered a very high risk. Because the La Mirada Vistas is a voucher-based project, the City will assist in the monitoring of this development to ensure the owners’ continued interest in providing opportunity to accept vouchers. Mirada Hills Rehabilitation and Convalescent Hospital, a nursing home facility located on 12200 S. La Mirada Blvd contains 54 living units with no units receiving Section 8 assistance is considered a non-risk housing development.

There are no project based at-risk units in the City of La Mirada at this time.

Should additional at risk units be identified in the future, there are a number of housing providers that have been identified by the State HCD as candidate entities that could assume responsibility for the replacement at-risk housing units. Examples of these candidate service providers in the area include the following:

- Community Rehabilitation Services, Inc.;
- The East Los Angeles Community Union (TELACU);
- FAME Housing Corporation;



- Los Angeles Center for Affordable Tenant Housing;
- Los Angeles Housing Partnership, Inc.; and,
- Los Angeles Low Income Housing Corp. (LALIH).

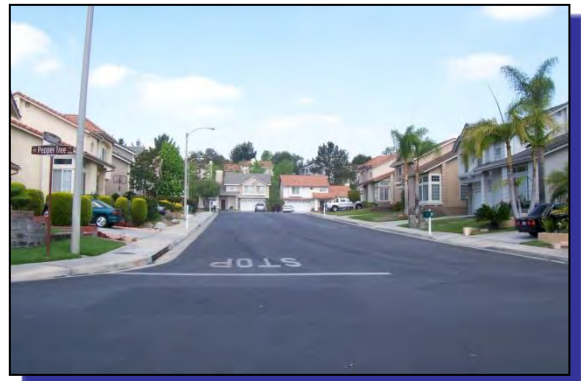
The replacement costs for the subsidized at risk developments in the Southern California area are prohibitive. There is limited vacant land in the City and replacement would likely occur as infill or redevelopment. A search on loopnet.com identified only one vacant parcel of land in La Mirada for sale at a cost of \$44 per square foot. The cost for new land in the area is expected to range from \$20 per square foot up to \$55 per square foot. According to RMeansOnline, the actual construction cost for residential development ranges from \$100 per square foot up to \$180 per square foot as of February 2013.. Based upon a hypothetical average unit size of 700 square feet. It is estimated a per unit replacement cost would not likely exceed \$126,000.

## 2.4 SPECIAL NEEDS

There are segments of the population that experience special housing needs. These groups include the elderly, persons with disabilities, female-headed households, and the homeless. The nature and extent of these special needs households in the City of La Mirada is discussed in this section (Section 2.4).

### 2.4.1 ELDERLY HOUSEHOLDS

Elderly households include those family households containing persons 65 years of age or older as well as non-family households (persons living alone) where the individual is 65 years of age or older. According to the 2010 U.S. Census, there were 7,377 residents that were 65 years of age or older. This population group accounts for 15.2% of the City's total population compared to 10.9% for the County. The 2010 U.S. Census also indicated that there were 5,223 households in the City (approximately 35.6% of the total number of households in the City) that had a household member 65 years of age or older. The same Census figures also identified 1,578 non-family households (22%) in the City with a resident 65 years of age or older. Of the total number of households in the City with a householder 65 years of age or older, the great majority lived in owner-occupied units. The Census indicated that 3,570 senior householders lived in owner-occupied units compared to 844 seniors living in rental units. Owner-occupied housing units occupied by seniors accounted for 30.8% of the total occupied units in the City. Elderly households living in rental units accounted for 27.5% of the total occupied rental units in the City. There are several opportunities for senior living in La Mirada. Some are reserved for low-income seniors.





- *Breezewood Village Senior Apartments* (16000 Grayville Drive) are rental units for low-income seniors.
- *Landmark Active Adult Community* (13710 Avenida Santa Tecla) is a complex that contains individually owned condos for seniors
- *The Palms* (13001 La Mirada Boulevard) are rental units reserved for seniors.
- *Somerset Glen Senior Apartments* (13380 Hillsborough Drive) are rental apartments reserved for low-income seniors.
- *Vista Alicante* (15811 Alicante Road) are rental units for low-income seniors.
- *La Mirada Vistas* (14129 Adoree Street) are federally subsidized rental units for low-income seniors.

#### **2.4.2 PERSONS WITH PHYSICAL AND DEVELOPMENTAL DISABILITIES**

The persons with physical and developmental disabilities have special needs when it comes to housing. Often, households in this category are also occupied by elderly persons as discussed in the previous section. Special interior improvements are often needed to accommodate a resident with a disability. For example, door frames must be wider to accommodate wheelchairs, ramps instead of stairs are needed, hand rails in bathrooms need to be installed, cabinet doors must be accessible, and light switches and other devices also needed to be within easy reach.

The cost for retrofitting an existing structure may cost thousands of dollars and be beyond the reach of those households with lower incomes. The lack of such housing is even more pronounced when it comes to market-rate rental units. Unless such provisions are made for persons with disabilities during original construction, such facilities will not likely be provided in a typical rental unit. The 2011 ACS DP-2 reported that a total of 4,731 persons residing in the City had a disability. Of this total number, 265 disabled persons were under the age of 18 years of age, 1,838 persons were working aged adults (18 to 64 years of age), and 2,628 were seniors (65 years of age or older).

State law requires that housing elements include an analysis of housing needs for residents with developmental disabilities. A developmental disability is a severe or chronic disability related to mental or physical impairment that is evident prior to adulthood. These disabilities may include autism, palsy, mental retardation, among others. La Mirada has a variety of services available for persons with disabilities. **Community Advocates for People’s Choice (CAPC)** provides life skills and employment training for persons with developmental disabilities and service approximately 20 La Mirada residents annually. Intercommunity Child Guidance Center and Helpline Youth Counseling, Inc. provides mental health and therapeutic day treatment for over 200 La Mirada Residents each year. South east Area Social Services Funding Authority (SASSFA) provides case management and home care services to La Mirada Residents. La Mirada is within the Eastern Los Angeles Regional Center catchment area and provides a **wealth of services and resources to La Mirada’s developmentally disabled residents.**



Table 13 provides a summary of residents in La Mirada with developmental disabilities, by age and zip code area. Out of the total of 430 residents with developmental disabilities, the majority were adults under the age of 55 as 149 persons were 14 years of age or younger, 74 persons were between 15 to 22 years of age and 164 persons were between 23 and 54 years of age.

| <b>Table 13<br/>Residents with Developmental Disabilities, by Age, for City of La Mirada</b> |                   |                    |                    |                    |                  |              |
|--|-------------------|--------------------|--------------------|--------------------|------------------|--------------|
| <b>Zip Code Area</b>   | <b>0-14 Years</b> | <b>15-22 Years</b> | <b>23-54 Years</b> | <b>55-65 Years</b> | <b>65+ Years</b> | <b>Total</b> |
| 90638  | 149               | 74                 | 164                | 31                 | 12               | 430          |
| 90639  | 0                 | 0                  | 0                  | 0                  | 0                | 0            |
| TOTAL  | 149               | 74                 | 164                | 31                 | 12               | 430          |

**2.4.3 LARGE FAMILIES**

According to the 2011 ACSB25009 which identified 14,361 households in La Mirada, 2,507 households (17.5%) contained five or more persons. A total of 1,890 large family households lived in owner-occupied units. The same ACS figures also indicated that 617 large family households lived in rental units.

**2.4.4 FEMALE-HEADED HOUSEHOLDS**

The 2011 ACS DP-2 reported that there were 1,505 female-headed families with no husband present, representing 10.5% of the total number of households in the City. This is an increase from 1,164 female-headed households in the City in 2000, and more than double the 643 female-headed households in the City in 1980. According to the 2011 ACS, there were 650 households in the City that were female-headed with no children present.

**2.4.5 FARM WORKER HOUSING**

The California Government Code requires that the City of La Mirada consider local farm worker housing needs in the preparation of the Housing Element of its General Plan. The 2011 ACS DP-3 reported 50 persons employed in the agriculture, forestry, fishing, and mining sector. Recognizing that the City is situated within an urbanized area with no remaining farming operations, the need for farm worker housing is non-existent. Furthermore, there are no farm-worker housing units in the City.





## 2.4.6 HOMELESS PERSONS AND FAMILIES

Housing Element Law requires local governments to plan for the provision of shelters and transitional housing for homeless persons and families and to identify adequate sites where such needs could be met. The most recent and comprehensive homeless survey was completed in 2011 as part of the Los Angeles Homeless Service Authority (LAHSA) homeless census. Due to the large size of Los Angeles County, it was necessary to conduct the enumeration over a period of three days. Statistical methods were used to forecast the balance of the Continuum's homeless population. The survey considered the following:

- Unsheltered homeless people, including those found on streets, in vehicles, in makeshift shelters (such as tents), and encampments;
- Sheltered homeless people occupying emergency shelters, transitional housing, domestic violence shelters, and those using vouchers to stay in hotels or motels; and
- A count of homeless people occupying short-stay institutions such as hospitals, residential rehabilitation facilities, and jails.

A general population survey of 1,000 randomly selected households throughout Los Angeles County was also implemented in an effort to discover homeless persons who would not have been identified by the above methods (otherwise known as the "hidden homeless"). These people were classified as unsheltered due to the fact that they do not utilize emergency shelter or transitional housing facilities for their nighttime accommodations. The City was included in the East Los Angeles County (SPA 7). The survey identified 3,281 unsheltered homeless persons and 1,236 sheltered persons. Emergency shelters provide an immediate short-term solution to homelessness, whereas transitional housing attempts to remove the basis for homelessness (i.e., lack of sufficient income for self support). Transitional housing can last as long as 18 months and generally includes integration with other social services and counseling programs to assist in the transition to self-sufficiency through the acquisition of a permanent income and housing. The City of La Mirada homeless assistance needs are currently handled by the Rio Hondo Temporary Home (RHTH), located on the grounds of the Metropolitan State Hospital in Norwalk. The facility contains 110 beds and is presently operating above capacity. Persons seeking shelter at the facility can stay from a minimum of one night to a maximum of 60 days. At present, it appears that the homeless needs of La Mirada residents are being met through the RHTH.

## 2.5 SOCIO ECONOMIC CHARACTERISTICS

### 2.5.1 INCOME CHARACTERISTICS

During the 10-year period between 1970 and 1980, the average family income in La Mirada increased from \$14,583 to \$27,786 per year, a 91% increase. From 1980 to 1990 the average family income increased from \$27,786 per year to \$54,987 per year, a 98% increase. From 1990 to 2000, the average family increased from \$54,987 per year to \$61,632 per year, a 12.1% increase. Finally, the median household income in 2011 was \$81,913, an increase of 32.91% since 2000. The 2011 ACS includes poverty statistics for the City based on 2010 income levels. According to the ACS data, there were 1,709 families



in La Mirada (3.7% of the total number of families in the City) that had incomes below the poverty level. In addition, 582 families living below the poverty level were female-headed. The ACS also indicated there were 2,367 individuals (5.1% of the total population) that had incomes below the poverty level. Table 14 summarizes the annual household income statistics for the City based on the 2011 ACS DP-3 statistics.

| Table 14<br>Household Income in La Mirada in 2011 |                   |            |
|---|-------------------|------------|
| Income Category                                   | No. of Households | % of Total |
| Less than \$10,000                                | 371               | 2.6        |
| \$10,000 to \$14,999                              | 430               | 3.0        |
| \$15,000 to \$24,999                              | 1,135             | 7.9        |
| \$25,000 to \$34,999                              | 1,258             | 8.8        |
| \$35,000 to \$49,999                              | 1,336             | 9.3        |
| \$50,000 to \$74,999                              | 2,070             | 14.4       |
| \$75,000 to \$99,999                              | 2,118             | 14.7       |
| \$100,000 to \$149,999                            | 3,444             | 24.0       |
| \$150,000 to \$199,999                            | 1,449             | 10.1       |
| \$200,000 or more                                 | 750               | 5.2        |
| Source: ACS 2011, DP-3                            |                   |            |

The HCD now requires local governments to identify those households that have incomes that are classified as *extremely low income*. Extremely low income households are those households that have annual incomes that were 30% or less of the County median family income (MFI). Households included in this category typically represented the lowest wage earners in a community with wages corresponding to the current annual minimum wage of \$8.00 per hour (as of January 1, 2013). The annual wage figure cited previously assumes full-time employment. Assuming the 30% figure for the median County income, an extremely low income household would have an annual income of \$19,440 based on the County MFI of \$64,800 for 2013. According to the 2011 ACS, 5.6% of La Mirada households earned less than \$15,000, falling into the extremely low income category based on the 2011 MFI for Los Angeles County.

**2.5.2 EMPLOYMENT CHARACTERISTICS**

Employment-related factors strongly influence the housing market in terms of regional and local housing distribution, housing costs, and housing types. As illustrated in Table 15, the largest employment sectors for La Mirada residents continue to be educational, health care and social services, manufacturing, and retail trade. These three sectors employed approximately 23%, 12.5% and 12.1% of the La Mirada workforce respectively.



**Table 15  
Occupation of City Residents**

| Industry                                  | Number | % of Workforce |
|---|--------|----------------|
| Agriculture, forestry, mining...          | 50     | 0.2%           |
| Construction                              | 1,392  | 6.3%           |
| Manufacturing                             | 2,781  | 12.5%          |
| Transportation                            | 1,195  | 5.4%           |
| Wholesale Trade                           | 1,112  | 5.0%           |
| Retail Trade                              | 2,690  | 12.1%          |
| Finance, insurance real estate            | 1,593  | 7.2%           |
| Arts, Entertainment                       | 1,796  | 8.1%           |
| Professional                              | 1,893  | 8.5%           |
| Educational services, health care, social | 5,116  | 23.0%          |
| Public Administration                     | 1,118  | 5.0%           |
| Other                                     | 1,052  | 4.7%           |
| Source: U. S. Census, 2011, DP-3          |        |                |





## SECTION 3 HOUSING CONSTRAINTS

The purpose of this section is to outline those factors that have the potential to impact housing development, maintenance and preservation. These factors focus on the following constraints:

- *Physical Constraints* are those environmental factors that could affect housing development.
- *Market Constraints* refer to those economic factors that may affect the construction of new housing in coming years.
- *Environmental Constraints* refer to those constraints that include governmental regulations that could impede or otherwise delay new housing construction.

### 3.1 PHYSICAL CONSTRAINTS

A major constraint to the development of new housing within the City of La Mirada is the lack of available undeveloped land and sites that are suitable for redevelopment for housing. As indicated previously, the City of La Mirada is largely urbanized, with few remaining vacant parcels available for development. No vacant land for new residential development is presently identified in the City of La Mirada Land Use Element. In fact, any future residential development will be limited to infill development that involves the replacement of either non-residential uses with new housing or the construction of higher density housing on lots containing lower density housing. Since the majority of the residential development is in sound, condition, the opportunities for the latter are limited. The great majority of land in the City is currently devoted to residential land uses.



Of the City's 3,841 acres, residential land uses account for 2,264 acres (approximately 60% of the City's total land area). According to the most recent Department of Finance figures, there are currently 15,093 housing units in the City. Table 15 below indicates the extent of residential development that is permitted under the adopted General Plan.



| Table 16<br>General Plan Residential Land Use Designations |                           |
|--|---------------------------|
| Land Use Designation                                       | Maximum Permitted Density |
| Low Density Residential                                    | 6 units/acre              |
| Medium Density Residential                                 | 15 units/acre             |
| High Density Residential                                   | 28 units/acre             |
| Total  |                           |
| Source: City of La Mirada General Plan                     |                           |

The most recent 2013 DOF housing estimates are provided in Table 16.

| Table 16<br>Actual Housing Estimates - 2013                |                           |            |
|--|---------------------------|------------|
| Housing Unit Types   | Dept. of Finance Estimate |            |
|  | # Units                   | % of Total |
| Single-family Detached                                     | 12,084 units              | 80.1%      |
| Single-Family Attached                                     | 762 units                 | 5.0%       |
| 2-4 Units/Structure  | 288 units                 | 1.9%       |
| 5 + Units/Structure  | 1,787 units               | 11.9%      |
| MobileHomes  | 172 units                 | 1.1%       |
| Total  | 15,093 units              | 100.0%     |
| Source: State of California Department of Finance 2013 E-5 |                           |            |

### 3.2 GOVERNMENTAL CONSTRAINTS

#### 3.2.1 LAND USE CONTROLS STANDARDS

The Land Use Element of the La Mirada General Plan sets forth the City's policies for guiding local development. These policies together with existing zoning, establish the amount and distribution of land to be allocated for various uses throughout the City.

The City's residential development standards, both on- and off-site, are not overly or unnecessarily restrictive. The density, setbacks and other standards regulating development within the City are in concert with those being used by other surrounding communities and will not inhibit the development of a range of housing types within the City. Furthermore, through the use of such tools as Specific Plans and its Planned Unit Development Ordinance, the City can encourage innovative planning and design that,



among other benefits, may translate into lower housing costs. For example, through the use of its Planned Unit Development Ordinance, the City has facilitated the development of more affordable housing by providing relief from parking, density, setback, and other development standards. The City has not imposed any moratoria, open-space requirements, prohibitions against multi-family housing, or growth controls that could inhibit the development of housing in La Mirada.

Table 18, provided below, describes the housing types by permitted uses. The City of La Mirada Zoning Ordinance stipulates the residential types permitted, conditionally permitted, or prohibited in each zone allowing residential uses. Permitted uses include those uses that are allowed without discretionary review as the project complies with all development standards. Conditional Use Permits (CUP) are approved by the Planning Commission unless appealed to the City Council.

| Table 18<br>Housing Types Permitted Under the Existing Zone Districts         |               |     |     |  |
|---|---------------|-----|-----|--|
| Use   | Zone District |     |     | Comments   |
|   | R-1           | R-3 | R-4 |  |
| Detached Single-Family  | P             | P   | P   |  |
| Duplex  | X             | P   | P   |  |
| Attached – 3 or more units  | X             | P   | P   |  |
| Group Home <6   | P             | P   | P   |  |
| Guest House   | C             | C   | C   |  |
| Residential Care Facility   | C             | C   | C   | Use must comply with applicable State Health and Safety Code provisions. |
| Mobile Home Park  | X             | C   | C   | Use must comply with applicable State Health and Safety Code provisions. |
| 2nd Unit  | P             | P   | P   | Permitted by right with compliance with State law and City standards.    |
| Transitional and supportive housing   | P             | P   | P   |  |
| <b>P</b> = Permitted <b>C</b> = Conditionally Permitted <b>X</b> = Prohibited |               |     |     |  |

An important tool used by the City in the implementation of its General Plan, is the Zoning Ordinance. Like the General Plan, the Zoning Ordinance (and zoning map) indicates the location and extent of permitted uses. The Zoning Ordinance, however, establishes additional development standards that further define the type, size, and orientation of development. As indicated in Table 19, the City of La Mirada Zoning Ordinance contains three zone districts (R-1, R-3, and R-4) that are specifically residential. The table also indicates the key development standards for each of the residential zone districts.

| Table 19<br>Summary of Residential Zone Districts |                                 |           |           |            |            |           |            |
|---|---------------------------------|-----------|-----------|------------|------------|-----------|------------|
| Development Standards                             | R-1 (Single-Family Residential) |           |           |            |            | R-3       | R-4        |
|   | 6,000                           | 7,500     | 8,000     | 10,000     | 15,000     |           |            |
| Min. Lot Size                                     | 6,000 sf.                       | 7,500 sf. | 8,000 sf. | 10,000 sf. | 15,000 sf. | 6,000 sf. | 10,000 sf. |
| Min. Lot Width                                    | 60 ft.                          | 75 ft.    | 75 ft.    | 90 ft.     | 100 ft.    | 60 ft.    | 60 ft.     |



**Table 19  
Summary of Residential Zone Districts**

| <b>Development Standards</b>               | <b>R-1 (Single-Family Residential)</b>   |        |        |        |        | <b>R-3</b>  | <b>R-4</b> |
|--|--|--------|--------|--------|--------|---|------------|
| Max. Lot Coverage                          | 40%  | 40%    | 40%    | 40%    | 40%    | 60%   | 40%        |
| Front Yard Setback                         | 20 ft.   | 20 ft. | 20 ft. | 20 ft. | 20 ft. | 20 ft.  | 15 ft.     |
| Side Yard Interior Setback                 | 5 ft.  | 5 ft.  | 5 ft.  | 10 ft. | 10 ft. | 5 ft.   | 10 ft.     |
| Street Side Yard Setback                   | 10 ft.   | 10 ft. | 10 ft. | 15 ft. | 15 ft. | 10 ft.  | 10 ft.     |
| Rear Yard Setback                          | 15 ft.   | 15 ft. | 15 ft. | 15 ft. | 15 ft. | 15 ft.  | 20 ft.     |
| Max. Building Height                       | 35 ft.   | 35 ft. | 35 ft. | 35 ft. | 35 ft. | 35 ft.  | 50 ft.     |
| Resident Parking (stalls /unit)            | 2 fully enclosed spaces/ dwelling unit   |        |        |        |        | 1.5 spaces/1 bedroom<br>2 spaces/2 or more bedrooms   |            |
| Guest Parking (stalls/units)               | No requirement for guest parking   |        |        |        |        | 1 space/5 units   |            |
| Min. Open Space                            | No minimum open space requirement.   |        |        |        |        | 500 sf/DU   | 400 sf/DU  |
| Permitted Uses                             | <ul style="list-style-type: none"> <li>● Single-Family</li> <li>● Group Home (6 or fewer residents)</li> <li>● Transitional Housing</li> <li>● Supportive Housing</li> </ul> |        |        |        |        | <ul style="list-style-type: none"> <li>● Single-Family Units</li> <li>● Duplex Units</li> <li>● Multiple-Family Units</li> <li>● Group Home (6 or fewer residents)</li> <li>● Transitional Housing</li> <li>● Supportive Housing</li> </ul> |            |
| Source: City of La Mirada Zoning Ordinance |  |        |        |        |        |   |            |

In 2012, La Mirada adopted an amendment to the **City’s Zoning Ordinance**. As part of this Zoning Ordinance amendment, the City established three residential overlay districts (Mixed Use, Emergency Shelter, and Special Housing) for the purpose of implementing special use or development standards for a specific area in addition to complying to the underlying base zone provisions. Table 20 shows a summary of development standards and permitted uses for the new residential overlay districts. The Mixed Use Overlay (MUO) district provides the integration of residential and commercial activities in land use areas in the City. Multiple-Family Units, Residential Infill, Mixed Uses and Single Room Occupancy (SRO) development are permitted uses in the MUO district. Additionally, the Emergency Shelter Overlay (ESO) provides temporary accommodations for a period of up to six months to people and families with housing needs. Finally, the Special Housing Overlay (SHO) district encourages new residential development including mixed uses and high density residential as permitted uses in particular areas of the city. In addition to land use controls, local building codes also affect the cost of housing. La Mirada has adopted the Los Angeles County Building Code, based on the 2010 California Building Code, which establishes minimum construction standards.



**Table 20  
Summary of Residential Overlay Districts**

| Development Standards          | Mixed Use Overlay (MUO)  | Emergency Shelter Overlay (ESO) | Special Housing Overlay (SHO)  |  |  |  |  |  |
|--------------------------------|--|---------------------------------|--|--|--|--|--|--|
|                                |  |                                 | Area 3   | Area 4   | Area 5   | Area 7   | Area 8   | Area 9   |
| Base Zone                      | -  | M-2                             | C-1  | R-1  | R-1  | C-4  | M-2  | C-1  |
| Coverage                       | -  | -                               | 50%  | 50%  | 50%  | 50%  | 50%  | 50%  |
| Front Yard Setback             | Base Zone  | -                               | 10 ft.   | 10 ft.   | 10 ft.   | 10 ft.   | 10 ft.   | 10 ft.   |
| Side Yard Interior             | Base Zone  | -                               | 5 ft.  | 5 ft.  | 5 ft.  | 0 ft.  | 5 ft.  | 5 ft.  |
| Street Side Yard Setback       | Base Zone  | -                               | 10 ft.   | 10 ft.   | 10 ft.   | 0 ft.  | 10 ft.   | 10 ft.   |
| Rear Yard Setback              | Base Zone  | -                               | 10 ft.   | 10 ft.   | 10 ft.   | 0 ft.  | 10 ft.   | 10 ft.   |
| Max. Building Height           | Not Exceed 3 stories   | -                               | 45 ft.   | 45 ft.   | 45 ft.   | 55 ft.   | 45 ft.   | 45 ft.   |
| Min. Floor Step-Back           | -  | -                               | 5 ft.  | 5 ft.  | 5 ft.  | 5 ft.  | 5 ft.  | 5 ft.  |
| Max. No of Units               | -  | -                               | 132 units  | 96 units   | 248 units  | 111 units  | 630 units  | 147 units  |
| Max. Density (units per acre)  | -  | -                               | 40 du/acre   | 40 du/acre   | 40 du/acre   | 30 du/acre   | 30 du/acre   | 30 du/acre   |
| Resident Parking (stalls/unit) | Base Zone  | Designed to provide security    | -  | -  | -  | -  | -  | -  |
| Min. Open Space                | For Mixed or Single Use, 25% of gross Residential Floor Area   | -                               | -  | -  | -  | -  | -  | -  |
| Permitted Uses                 | <ul style="list-style-type: none"> <li>● Multiple-Family Units</li> <li>● Residential Infill</li> <li>● Mixed Uses</li> <li>● Single Room Occupancy</li> </ul> | ● Temporary Accommodations      | <ul style="list-style-type: none"> <li>● Mixed Uses</li> <li>● High Density Residential</li> </ul> | <ul style="list-style-type: none"> <li>● Mixed Uses</li> <li>● High Density Residential</li> </ul> | <ul style="list-style-type: none"> <li>● Mixed Uses</li> <li>● High Density Residential</li> </ul> | <ul style="list-style-type: none"> <li>● Mixed Uses</li> <li>● High Density Residential</li> </ul> | <ul style="list-style-type: none"> <li>● High Density Residential</li> </ul> | <ul style="list-style-type: none"> <li>● Mixed Uses</li> <li>● High Density Residential</li> </ul> |

Source: City of La Mirada Zoning Ordinance

### 3.2.2 PERMIT PROCESSING AND REVIEW

The City of La Mirada has fully implemented the establishment of "one-stop" permit coordination, and is committed to completing the processing of all residential development applications within the time frames stipulated in the State Permit Streamlining Act. Moreover, based on periodic surveys conducted by the City, local processing times are quite comparable to those experienced in surrounding communities. As in the case of its processing requirements, the permit processing fees charged by the City are not



unreasonable. The fees that are charged by the City are a reflection of the time and effort that must be expended by City staff in order to properly review development plans. Moreover, the City will continue to conduct periodic surveys (both formal and informal) of other cities in the La Mirada area to ensure that local processing costs do not become a constraint on housing production.

The time required to process a project varies greatly from one project to another and is directly related to the size and complexity of the proposal and the number of actions or approvals needed to complete the process. For example, a ministerial review for a single-family home would be processed concurrently with the design review.

The City also encourages the joint processing of related applications for a single project. As an example, a rezone petition may be reviewed in conjunction with the required site plan, a tentative tract map, and any necessary variances. Such procedures save time, money, and effort for both the public and private sector and could decrease the costs for the developer by as much as 30%. As indicated previously, the City works closely with developers to expedite approval procedures so as not to put any unnecessary timing constraints on development. For a typical housing project, an initial pre-consultation meeting with the Community Development Department, Public Works, and the Fire Department is arranged to discuss the development proposal. Depending on the complexity of the project, a single-family project is approved in 10 days from date of plan submission if no variances, exceptions, or zone changes are needed.

After the project is approved, the building department performs plan checks and issues building permits. Throughout the construction of a residential development, the building department will perform building checks to monitor the progress of the project. This process does not seem to put an undue time constraint on most developments because of the close working relationship between City staff, developers, and the decision-making body. Table 21 outlines typical approval requirements for a single-family infill project, a typical subdivision, and a typical multiple-family rental housing development.

| <b>Table 21</b><br><b>Typical Processing Procedures for the City of La Mirada</b>       |                          |   |
|---|--------------------------|---|
| <b>Single Family Unit</b>   | <b>Subdivision</b>       | <b>Multifamily Units</b>                  |
| Site Plan   | Tentative Map            | Site Plan                                 |
| Design Review   | Final Map                | Certificate of Compatibility <sup>1</sup> |
| Initial Study <sup>1</sup>  | --                       | Design Review                             |
| Site Plan Review  | --                       | Variance <sup>1</sup>                     |
| Design Review   | --                       | Negative Declaration <sup>1</sup>         |
| Processing Time 4 weeks   | Processing Time 6 months | Processing Time 6-8 months                |
| 1. May not be required if it conforms to zoning standards.<br>Source: City of La Mirada |                          |   |



Multifamily projects take an average of 8 months to process, usually because of variance requests. The **City’s Code Enforcement officers** are responsible for issuance violation notices. At the time these violations are issued, **the officer provides the property owners with handouts describing the City’s** housing rehabilitation programs, eligibility requirements, and the appropriate contact information.

The City’s review process includes a compatibility review culminating with *Certificate of Compatibility* to ensure that all residential development, including new homes, multiple-family residential developments, and substantial remodels are in conformance with the surrounding neighborhood. The chief aim of this process was to discourage “mansionization” in the lower density single-family neighborhoods. The process includes a site plan review and design review by staff and the Planning Commission. The goal is not to discourage new housing improvements and development, but rather to ensure that they conform to the scale and mass of the surrounding neighborhood. To grant a Certificate of Compatibility, the Planning Commission is required to make all of the following findings by the adoption of a formal resolution:

- The proposed structure or addition is designed so that it complies with the development **standards of the zoning code in which it is to be located and the City’s General Plan;**
- The proposed structure or addition complies with the most recent edition of the California Building Code as adopted and amended by the City; applicable public works development standards, policies and requirements; standards, policies and criteria in an adopted redevelopment plan; and any other applicable regulations, policies or standards;
- The proposed structure or addition, as conditioned, is not economically or aesthetically detrimental to existing or previously approved uses or structures within the surrounding area; and
- The proposed structure or addition is aesthetically compatible with the existing uses and structures within the surrounding area, and complies with any applicable design guidelines, policies and/or standards established for the purposes of the Certificate of Compatibility, including application review and approval.

The Planning Commission may impose conditions upon a proposed development where the Commission determines that these conditions are necessary to further the objectives outlined in the above findings.

### **3.2.3 FEES AND DEVELOPMENT COSTS**

The City does not impose any development impact fees on new residential development, nor does it require land dedication or other exactions of affordable housing developments. The Norwalk-La Mirada Unified School District does impose a school impact fee on new residential development in accordance with State law, and the City has no control over the imposition of this fee. The current discretionary fees charged by the City are summarized below in Table 22.



**Table 22  
Current Discretionary Fees for the City**

| Description                              | Fee                  |
|--|----------------------|
| Conditional Use Permit                   | \$2,785              |
| Redevelopment Site Plan/Elevation Review | \$1,200              |
| Minor Variance                           | \$275                |
| Zone Variance                            | \$2,785              |
| Tentative Parcel/Tract Map Review        | \$5,080              |
| Final Parcel/Tract Map Review            | \$700                |
| Lot Line Adjustment Review               | \$530                |
| Zone Change                              | \$7,000<br>(deposit) |
| Planned Unit Development                 | \$7,000<br>(deposit) |
| General Plan Amendment                   | \$7,000<br>(deposit) |
| Categorical Exemption Review             | \$210                |
| Negative Declaration                     | \$1,260              |
| Environmental Impact Report Review       | \$3,000<br>(deposit) |
| Appeal Planning Commission Action        | \$1,215              |
| Continuance of Public Hearing            | \$420                |
| Certificate of Compatibility             | \$2,785              |
| Source: City of La Mirada                |                      |

The City of La Mirada Building and Safety Engineering Division is responsible for ensuring that all new construction is performed and completed in a safe and proper manner using the correct materials and methods. Permits are required for any changes including, electrical, plumbing or building changes to any property. Applicants and/or contractors are required to bring their plans to City Hall where a building inspector will examine the plans for approval. The building permit provides evidence that the contractor has complied with the Building Code and the City has approved the proposed construction. The building permit also serves as the permanent record of all improvements done to a particular structure. Building permits are required to do new work as well as most repair work.

Table 23 estimates the building fees for a typical single-family home and multiple-family development. The fees shown in Table 23 are applicable to both single-family and multiple family development. The processing fees are well under one percent of the total development cost. Assuming a 1,000 square foot unit, the total development fees (including school district fees) would be approximately \$5,470 per unit. This assumes 20 electrical fixtures, 5 plumbing fixtures, one sewer connections, and one thousand square feet of floor area. The permit fees account for less than 3% of a residential units costing \$225,000.

The City of La Mirada has reviewed all fees and site improvement requirements and has concluded these





requirements do not pose a demonstrable negative impact on the ability to provide housing at a variety of income levels in the City.

| Table 23<br>Typical Planning Processing Fees  |  |
|---|--|
| Fee   | Fee  |
| Building Permit   | Fees based on project cost – 1%-3% of project valuation                                  |
| Plan Check Fee  | Fees based on project cost – 1%-3% of project valuation                                  |
| Electrical Permit   | \$2.40/outlet or fixture+ \$32.50 issuance fee   |
| Plumbing Permit   | \$19.00/fixture+\$32.50 issuance fee   |
| Mechanical Permit   | \$32.50 issuance Fee + \$31.90/furnace,<br>\$31.90/condenser, \$5.10/air inlet or outlet |
| Sewer/Septic Permit   | \$55.20/connection + \$32.50 issuance fee  |
| School District   | \$3.20/sq.ft. for residential; \$0.51 for senior housing <sup>1</sup>                    |
| Sources: La Mirada Building and Safety/Engineering Division; <sup>1</sup> Norwalk-La Mirada School District |  |

### 3.2.4 CONSTRAINTS FOR REASONABLE ACCOMMODATION

As indicated previously, persons with disabilities often have unique and special needs when it comes to housing. Often, households in this category include elderly persons that may have one or more disabilities. Special interior improvements are often needed to accommodate a disabled tenant or homeowner. For example, door frames must be wider to accommodate wheel chairs, ramps instead of stairs are needed, hand rails in bathrooms need to be installed, cabinet doors must be accessible, and light switches and other devices also need to be within easy reach. The cost for retrofitting an existing structure may cost thousands of dollars and be beyond the reach of those households with lower incomes. The lack of such housing is even more pronounced when it comes to market-rate rental units. The City of La Mirada requires that all new residential developments comply with California building standards (Title 24 of the California Code of Regulations) and federal requirements for accessibility.

- **Efforts to Remove Regulatory Constraints for Persons with Disabilities.** The State has removed any City discretion for review of small group homes for persons with disabilities (six or fewer residents). The City does not impose additional zoning, building code, or permitting procedures other than those allowed by State law. There are no City initiated constraints on housing for persons with disabilities caused or controlled by the City.
- **Retrofitting Requirements.** The City also allows residential retrofitting to increase the suitability of homes for persons with disabilities in compliance with accessibility requirements. In addition, the City works with applicants who need special accommodations in their homes to ensure that application of building code requirements does not create a constraint.
- **Information Regarding Accommodation for Zoning, Permit Processing, and Building Codes.** The City provides information to all interested parties regarding accommodations in zoning, permit processes, and application of building codes for housing for persons with disabilities.



- **Zoning and Other Land Use Regulations.** The City has not identified any zoning or other land-use regulatory practices that could discriminate against persons with disabilities and impede the availability of such housing for these individuals.

The City currently permits some variation from the application of its parking standards.

- The Zoning Ordinance allows for the reduction of parking spaces for a unique use such as a senior housing project or other special needs. Similarly, the Zoning Ordinance provides the Planning Department with the authority to establish and approve parking stalls and maneuvering areas other than those set in the ordinance. However, this flexibility is not explicit for housing for persons with disabilities and special needs.
- The City does not restrict occupancy of unrelated individuals in group homes and does not define family or enforce a definition in its zoning ordinance. The City permits housing for special needs groups, including for individuals with disabilities, without regard to distances between such uses or the number of uses in any part of the City.

### 3.2.5 AVAILABILITY OF INFRASTRUCTURE

Approximately 80% of the City's water supply is provided by groundwater resources pumped through wells and which is subsequently distributed throughout the City. The remaining 20% is purchased through agreements with the Metropolitan Water District. As of 2011, the average water consumption in the City is approximately 8 million gallons per day (mgd). The City was able to meet water supply demands and accommodate the 2006-2014 RHNA allocation of 1,751 housing units. The units required to meet the RHNA (235 units) contemplated in this Housing Element is less than the RHNA for the 2006-2014 Housing Element Planning Period. Thus, the capacity of water-related service and infrastructure is not considered to be an obstacle in the development of future housing in La Mirada.

The County Sanitation Districts maintains and operates the sewer system in the City. Information provided by the Los Angeles County Sanitation District indicates that the project site is served by the County's Sanitation District No. 18. Sewer lines are maintained by the County Department of Public Works, with sewage from the area conveyed through sewer mains into the Los Coyotes Wastewater Reclamation Plant (WRP) located in the City of Cerritos. The Los Coyotes WRP has a design capacity of 37.5 million gallons per day (mgd) and currently processes an average flow of 20.7 mgd.<sup>3</sup> Based on the RHNA allocation for the 2006-2014 Housing Element Planning Period, the 1,751 units was projected to generate 315,180 gallons of effluent on a daily basis. Given that the projected demand for the previous planning period was able to be met by the City, **the City's future developments' treatment demand** including the current 2014-2021 RHNA allocation of 235 units will be reduced and therefore can be sufficiently met by the service provider.

<sup>3</sup> Los Angeles County Sanitation District, *Email and Telephone Communication with Adriana Raza, Will Serve Program*, November 2013.



### 3.3 MARKET CONSTRAINTS

One of the major obstacles to providing housing to meet the needs of all economic segments of the community is the nature of the housing market itself. Throughout Los Angeles County, housing prices have rebounded in recent years from the decline in values realized during the recession of the late 2000's. During that time, the median home sales price declined by nearly 25% between May 2007 and 2008. August 2007 was considered to be the start of the current credit crisis that marked the beginning of a 26-month continuous trend in falling median home prices. In recent years, median home sales prices have increased by over 18% between June 2012 and 2013. Three interrelated cost factors influence the overall development cost and ultimately dictate the market price of a home. These factors include the cost of raw land, construction cost (labor and materials), and financing cost.



Market Constraints refer to those economic and market factors that may affect the cost of new housing development. As a general rule, the City's ability to affect market constraints is limited in that these constraints are typically related to market forces that are common throughout the larger region. These market forces may include, but not be limited to, the cost of land, construction (materials and labor), and financing.

Even with the current rise in housing values nationwide, recent statistics indicate that Southern California remains as one of the most expensive housing markets in the country. In June of 2013, the median price paid for a home in the region was \$415,000, an increase of 18.49% from \$350,250 in June 2012. For the year 2012, the median home sales price for a single-family home in the City was \$350,000 while the median sales price for condominiums was \$359,000.

#### 3.3.1 LAND COSTS

The land costs and construction costs for new housing in La Mirada are comparable to those of the surrounding communities. As a result, the overall cost for residential development, when raw or underutilized land is available, is not significantly different from that of the surrounding communities. Vacant and underutilized land in La Mirada is limited. For example, many of the adjacent communities have long segments of strip commercial development that includes some commercially zoned properties that are vacant and/or underutilized. The improvements on these sites could be demolished and improved for residential infill development. However, as indicated in a preceding section, no such strip commercial corridors are found in La Mirada.

The scarcity of land suitable for new residential construction in the City impacts the land costs. Recognizing that new tract homes in La Mirada are selling for \$300,000 to \$400,000 and that custom-built homes are currently starting at \$600,000, the 25% figure identified above would translate into a



finished lot price of at least \$75,000 per unit for the least expensive tract home and \$100,000 for the most expensive tract home. On the other hand, finished lot costs associated with a \$600,000 custom home would be approximately \$150,000.

### **3.3.2 CONSTRUCTION COSTS**

Similar to land costs, construction costs have also been escalating rapidly in recent years. The single largest cost associated with building a new house is the cost of building materials. Construction costs for wood frame, single-family construction of average to good quality range from \$100 to \$125 per square foot, custom homes and units with extra amenities running somewhat higher. These costs can account for more than half of the total construction cost. Multifamily construction costs average between \$150 and \$180 per square foot.

### **3.3.3 AVAILABILITY OF FINANCING**

Local banks and other lending institutions in the community provide a ready source of available financing for constructing new housing and rehabilitating and conserving existing housing stock. Based on Data Quick home sales statistics, the number of for-sale units that have sold in June 2013 in La Mirada were generally comparable with those of several neighboring cities including Cerritos, Norwalk and La Habra. The housing units constructed in newer residential developments in the City have sold very quickly, indicating that the lending institutions were not withholding loans to those individuals seek.

### **3.3.4 LOW VACANCY RATES**

According to the most recent 2011 ACS, B25004, there were a total of 459 units in La Mirada that were vacant. This figure accounted for approximately 3.1% of the total number of units in the City. Of this figure, 59 units (12.9%) were vacant rental units and 36 units (7.8%) were units that were classified as non-rental units for sale only. The remainder included vacant seasonal units, recreational units or units that were rented or sold but not yet occupied. According to the most recent DOF estimates, there were 411 vacant units in the City as of January 2013 with a vacancy rate of 2.7%.

## **3.4 ENVIRONMENTAL CONSTRAINTS**

Because of the urban character of the City, any future redevelopment may require the remediation of contaminated soils or the removal of lead, asbestos, and other hazardous materials associated with the previous use. This is especially true for those properties where non-residential development occupied the parcel. **Prior to the 1970's, asbestos was widely used in insulation, floor tiles, and other building materials.** Lead contaminants from paint are often found in older building materials and soils. Other contaminants related to the historic use of the site may also be present. Most lending institutions require detailed investigations to determine if any contamination is present. The cost for these investigations and any remediation will contribute to the redevelopment costs in both time and money. As other properties undergo recycling, the aforementioned due diligence will be required.



## SECTION 4 HOUSING PLAN

### 4.1 FORMAT AND STRUCTURE

This section of the City of La Mirada Housing Element addresses the State's housing element requirements for a "statement of the community goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing. This Housing Plan consists of the following components:

- *Regional Housing Needs* provides a discussion of the Regional Housing Needs Assessment and how the City intends to accommodate its identified housing need.
- *Housing Goals and Policies* indicates those policies that will be applicable over the course of the planning period governed by this Element;
- *Housing Programs* indicates those specific programs that will be effective in assisting in the conservation of affordable housing, the development of new affordable housing, the identification and provision of new sites for residential development, and the removal of governmental constraints.

### 4.2 REGIONAL HOUSING NEEDS (RHNA)

The RHNA for La Mirada totals 235 units. This RHNA includes the following:

- A total **62** units are allocated to households with annual incomes that are *very low income* (50% or less of the County median household income);
- A total of 37 units for low income households (50% to 80% of the County median);
- A total of 40 units for moderate income households (80%-120% of the County median); and,
- A total of 96 units for above moderate income households (120% and above).

While the State Legislature acknowledges the City's inability to directly provide the 235 units during the 2014-2021 planning period, the City is required to ensure that the General Plan and Zoning Ordinance provides for this development. Table 24 illustrates the distribution of the projected housing needs for the four income categories.



| <b>Table 24<br/>Summary of RHNA Allocation for la<br/>Mirada</b>                   |             |          |
|--|-------------|----------|
| <b>Income Level</b>  | <b>RHNA</b> | <b>%</b> |
| Very Low-Income  | 62          | 26.4%    |
| Low -Income  | 37          | 15.7%    |
| Moderate-Income  | 40          | 17.0%    |
| Above Moderate   | 96          | 40.9%    |
| Total  | 235         | 100%     |
| Source Southern California Association of Governments<br>and the City of La Mirada |             |          |

### 4.3 NEW HOUSING STRATEGY

Problems related to the provision of this number of new housing units over a relatively short time frame (2014 to 2021) is exacerbated by the following factors:

- There is virtually no remaining vacant land in the City .
- The great majority of the City is already zoned and developed in residential land uses. The industrial areas are concentrated in the southern portion of the City. Very little land is devoted to commercial uses and these are limited to key intersections in selected areas of the City.
- Compared to the surrounding communities, the proportion of La Mirada’s land area devoted to residential development far exceeds that of the adjacent communities. The rezoning of the industrial and commercially zoned land would translate into a further loss in both jobs and revenue.
- **The RHNA is based on a community’s past performance in providing new housing and the City’s success has resulted in a RHNA figure that will be difficult for the City to realize under the best of economic conditions.**

The City will accommodate its 2014-2021 RHNA need through the Housing Infill Program. This program promotes infill development within nine distinct areas. As part of the implementation of the 2006-2014 Housing Element, the City adopted a Special Housing Overlay Zoning District that has been applied to these nine areas. Three of these areas are within the Imperial Highway Corridor Specific Plan. A total of 1,786 units can be accommodated through the Special Housing Overlay Zoning District.



### 4.3.1 IMPERIAL HIGHWAY CORRIDOR SPECIFIC PLAN

A cornerstone of the New Housing Strategy involves the implementation the Imperial Highway Corridor Specific Plan. In addition to promoting new types of residential development within key development “nodes”, the Specific Plan indicates strategies that promote sustainable community concepts.

The City applied for and successfully obtained a grant to prepare the Specific Plan during the summer of 2009. The grant was part of the Southern California Association of Governments (SCAG) *Compass Blueprint Program* that was designed to foster comprehensive land use and transportation planning. The following key planning factors formed the policy foundation of the Specific Plan.

- The Imperial Highway corridor is one of the areas in the City with the largest potential for economic growth. La Mirada has limited land available for commercial and employment **generating development. The corridor’s underutilized areas are primed for redevelopment with new uses.**
- The Regional Housing Needs Assessment (RHNA) projects a housing growth need of 235 units for La Mirada through 2021. Under State law, the City is required to provide the regulatory framework to accommodate this growth need. **The City’s** Housing Element identifies potential sites within the Imperial Highway Specific Plan area to accommodate a portion of the growth need.
- The three key intersections or nodes in the Imperial Highway Specific Plan area provide opportunities for community-gathering, entertainment and recreational areas. The residents of La Mirada strongly desire increased dining and family entertainment opportunities in the City. Currently, there are limited areas in the City that residents and visitors can frequent as destination points. The nodes are accessible by transit, car, bicycle and walking and can be enhanced to create spaces for social interaction.
- The three nodes in the Specific Plan area are surrounded by existing residential neighborhoods. Access from these neighborhoods to new development at the nodes will greatly enhance the ability of residents to frequent the retail, entertainment and recreational areas planned.
- There are significant opportunities to improve the streetscape environment along Imperial Highway. Some improvements including signage, street furniture, medians and landscaping have been made on segments of the corridor, but these improvements should extend the full length of Imperial Highway in the City. The City must coordinate with both the County of Los Angeles and the County of Orange to improve the full length.
- **Since La Mirada is a community that is largely “built-out” and the Imperial Highway Specific Plan area encompasses many parcels with multiple property owners, economic development and revitalization must be achieved through creative approaches that seek to optimize the potential of already “urbanized” land.**



- The Imperial Highway corridor must balance economic opportunities with residential and community-supportive uses in order to create a place for people to live, work, shop and play.
- The proximity of the corridor to institutional and civic uses such as Biola University and the Civic Center provide market potential and opportunities to extend connections beyond the Specific Plan area and provide complimentary uses and amenities.

The Imperial Highway Corridor is auto-oriented, but contains elements for pedestrians. Future development and highway improvements should incorporate health and wellness design principles. The **Imperial Highway Corridor Specific Plan underscores the community’s commitment in considering alternative strategies to provide new and innovative housing in the City.** As part of this new development, the following guiding principles apply:

- Create a lively mixed-use environment that provides a variety of housing, retail, and recreation opportunities and choices.
- Provide for coordinated land use, urban design, transportation and infrastructure planning.
- Retain high-performing existing businesses while accommodating the recruitment of new businesses.
- Maintain and enhance a positive image of La Mirada for both residents and visitors.
- Improve pedestrian and bicycle accessibility, parking and transit to establish safety and comfort throughout the Specific Plan area.
- Create public gathering spaces within the corridor.
- Provide for community-accessible social and recreational amenities.
- Provide a variety of housing types for households with varied income levels and housing needs.
- Enhance La Mirada Creek Park as a pedestrian and recreational resource by providing and enhancing access to and from residential and commercial areas.
- Encourage a streamlined and predictable discretionary review process.
- Encourage the conservation of resources in the natural and manmade environment through sustainable development principles.
- Promote partnerships (either public-private or private-private) to share resources in an effort to revitalize the Imperial Highway corridor.
- Establish incentives for encouraging the development and construction of well-designed, safe and attractive streetscape and public elements.





The Imperial Highway Specific Plan was adopted in October 2011. The Specific Plan replaced the City's General Plan and Zoning for the project area. The Specific Plan provides a comprehensive policy and regulatory and design guidance to ensure future development and redevelopment implements the vision and adopted policy for the land within the boundaries of the Specific Plan.

### 4.3.2 HOUSING INFILL PROGRAM

As part of the 2006-2014 Housing Element, a comprehensive survey was undertaken to identify specific areas that could accommodate new residential or mixed use development. A total of nine areas were identified, including three areas located along the Imperial Highway corridor discussed in the previous section. These areas, referred to Area 1 through 9, are shown in Exhibits 6 through 13. As part of the implementation of the 2006-2014 Housing Element, these sites were rezoned to be included in the Special Housing Overlay and now allow for development at the densities identified in the 2006-2014 Housing Element (30 or 40 du/ac). These areas are still available for development and will continue to be utilized by the City to accommodate its 2014-2021 RHNA need.

The individual areas are discussed further in the following paragraphs. The potential build-out is defined in units per acre and assumes the *net* land area available for actual development. The net land area for each of the infill areas was obtained for parcel level data where roadway rights-of-ways, easements, and other potential limitations were considered. The maximum potential density is achievable for all of the infill sites since the available land area includes the developable areas currently occupied by development.

- **Infill Area 1.** This area is located in the westernmost segment of Imperial Highway that is within the City's corporate boundaries. The site is occupied by a commercial center that has experienced a high vacancy rate. The entire property consists of 5.4 acres of land area. The development density for this area will be 45 units per acre, yielding a potential development of 253 units. The potential mixed use development will essentially occupy all of the developable areas of the site currently occupied by the commercial center. The existing commercial center has an existing floor area of approximately 64,400 square feet. The underlying development standards are regulated through the Imperial Highway Specific Plan. The potential development could either be mixed use or multiple-family development. This infill area is indicated in Exhibit 7.
- **Infill Area 2.** This area is located to the south of the intersection of Imperial Highway and Valley View Avenue, just north of Adoree Street. The potential infill site is located to the south of an existing commercial center situated on the southwest corner of Imperial Highway and Valley View Avenue. The site is occupied by a commercial use that is now closed. The property consists of 2.0 acres of land area. The development density for this area will be 45 units per acre, yielding a potential development of 90 units. The underlying development standards are regulated through the Imperial Highway Specific Plan. The development contemplated for this site will consist of Senior Housing development. This infill area is indicated in Exhibit 7.
- **Infill Area 3.** This infill area is located to the south of the Leffingwell Road along the east side of La Mirada Boulevard. This area is occupied by a variety of land uses including a surface parking lot, a single-family home, an office building, and a neighborhood commercial center. The



property consists of 3.3 acres of land area. The development density for this area will be 40 units per acre, yielding a potential development of 132 units. The maximum potential density is achievable since the future residential or mixed use development will occupy all of the developable areas of the site currently occupied by the previous use. The underlying zoning is R-1 and C-1. The development contemplated for this site will consist of either mixed use or multiple-family development. This infill area is indicated in Exhibit 8.

- **Infill Area 4.** This infill area is located on the east side of La Mirada Boulevard and north of Granada Avenue. This site is occupied by an existing church. The property consists of 2.4 acres of land area. The development density for this area will be 40 units per acre, yielding a potential development of 96 units. The property is currently Zoned R-1. The development contemplated for this site will consist of either mixed use or multiple-family development. This infill area is indicated in Exhibit 9.
- **Infill Area 5.** This infill area is located immediately south of Area 4, on the south side of Granada Avenue (and east of La Mirada Boulevard). This site is occupied by a commercial building, a volunteer center, and preschool. The property consists of 6.2 acres of land area. The development density for this area will be 40 units per acre, yielding a potential development of 248 units. The underlying zoning is R-1. The development contemplated for this site will consist of either mixed use or multiple-family development. This infill area is indicated in Exhibit 9.
- **Infill Area 6.** This infill area is located on the southwest corner of Imperial Highway and Santa Gertrudes Avenue. This site is occupied by an office building, vacant lot, and a small commercial center. The property consists of 5.9 acres of land area. The development density for this area will be 15 units per acre, yielding a potential development of 89 units. The underlying development standards are regulated through the Imperial Highway Specific Plan. The development contemplated for this site will consist of either mixed use or multiple-family development. This infill area is indicated in Exhibit 10.
- **Infill Area 7.** This infill area is situated on a triangular-shaped parcel located south of Alondra Boulevard and north of Stage Road. This site is occupied by a small commercial center. The property consists of 3.7 acres of land area. The development density for this area will be 30 units per acre, yielding a potential development of 111 units. The underlying zoning is C-1/PUD. The development contemplated for this site will consist of either mixed use or multiple-family development. This infill area is indicated in Exhibit 11.
- **Infill Area 8.** This infill area is located in the western portion of the City, north of Rosecrans Avenue and west of Valley View Avenue. This area is occupied by a number of industrial businesses that intrude into an existing residential neighborhood located further north. This infill area consists of 21.0 acres of land area. The development density for this area will be 30 units per acre, yielding a potential development of 630 units. The underlying zoning is M-2. The development contemplated for this site will consist of multiple-family development exclusively. This infill area is indicated in Exhibit 12.

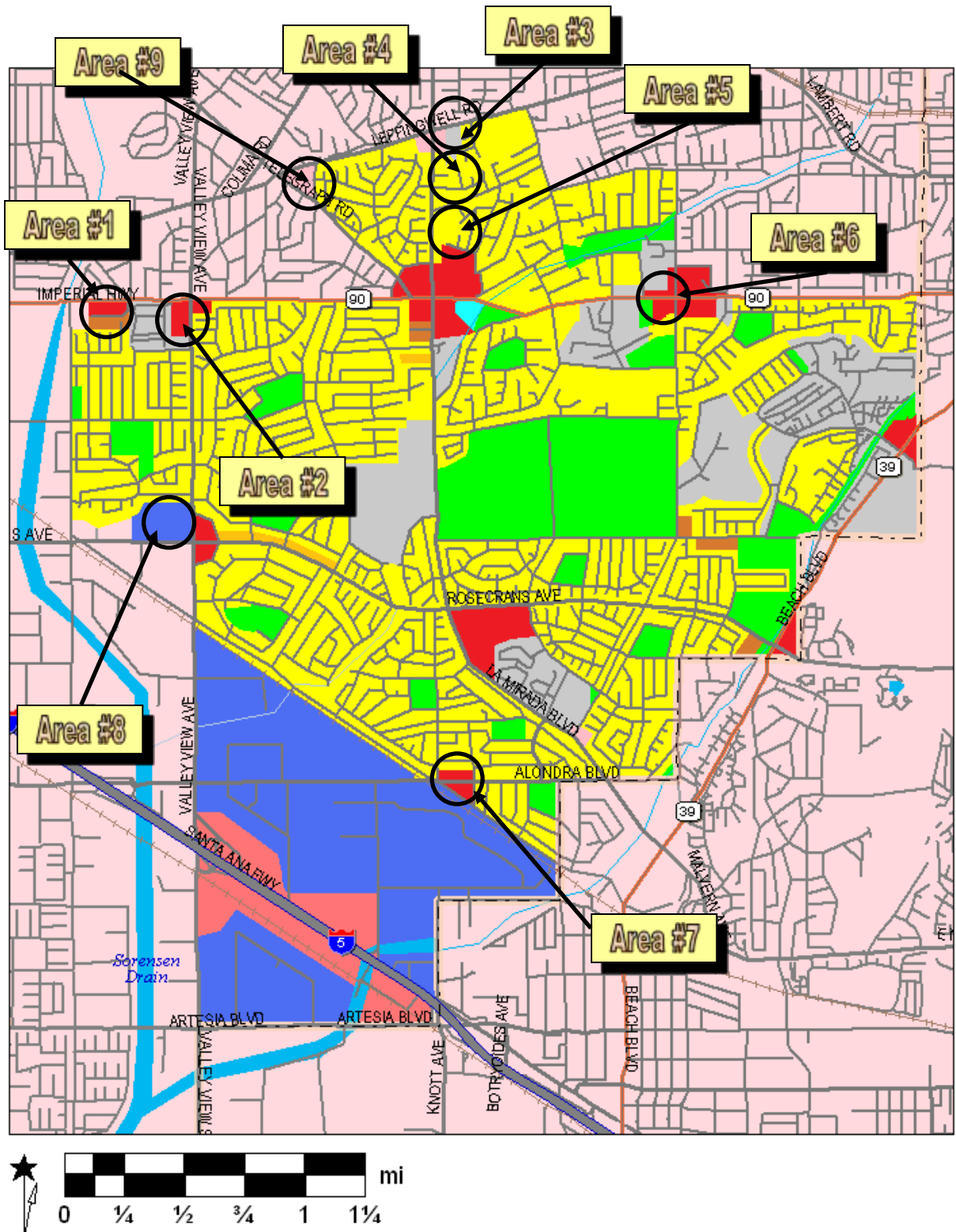


- **Infill Area 9.** This infill area is situated on a triangular-shaped parcel located south of Leffingwell Road and north of Telegraph Road. This site is occupied by a small commercial center. The property consists of 4.9 acres of land area. The development density for this area will be 30 units per acre, yielding a potential development of 147 units. The underlying zoning is C-1. The development contemplated for this site will consist of either mixed use or multiple-family development. This infill area is indicated in Exhibit 13.

The potential development possible within the nine infill sites would yield a total of 1,786 units which exceeds the required RHNA of 235 units by 1,551 units. Infill Area #6 permits up to 15 du/ac and assumed to provide for moderate or above moderate income units. The remaining infill areas permit densities of up to 30, 40 or 45 du/ac, meeting the default density standard under AB2348 and allowing the City to count these sites toward meeting the lower income RHNA needs. The development densities identified for each infill site is considered to be a realistic and achievable goal since the net land area was considered in the build-out calculations. Greater densities may be possible with the allocation of density bonuses for affordable housing.

### **4.3.3 HOUSING STRATEGY AND THE RHNA**

As part of the 2006-2014 Housing Element, the City took a fresh look at its general plan, development density standards, and other expanded initiatives that may be used to assist in the development of new housing. Continuing the housing strategy discussed in the previous sections will enable the City to meet its 2014-2021 RHNA requirement.



### EXHIBIT 6 OVERVIEW OF HOUSING INFILL AREAS

SOURCE: BLODGETT/BAYLOSIS ASSOCIATES

Attachment: City of La Mirada 2013-2021 Housing Element (Appeal of the Draft RHNA Allocation for the City of La Mirada)



**Area #1**

*Land Area - 5.6 acres*  
*Zoning - Imperial Highway Specific Plan PA-1A/*  
*Allowable Density - 45 units/acre*  
*Potential Development - 243 units*

**Area #2**

*Land Area - 2.0 acres*  
*Zoning - Imperial Highway Specific Plan PA-1B/*  
*Allowable Density - 45 units/acre*  
*Potential Development - 90 units*

**EXHIBIT 7**  
**HOUSING INFILL AREAS - #1 AND #2**  
SOURCE: BLODGETT/BAYLOSIS ASSOCIATES

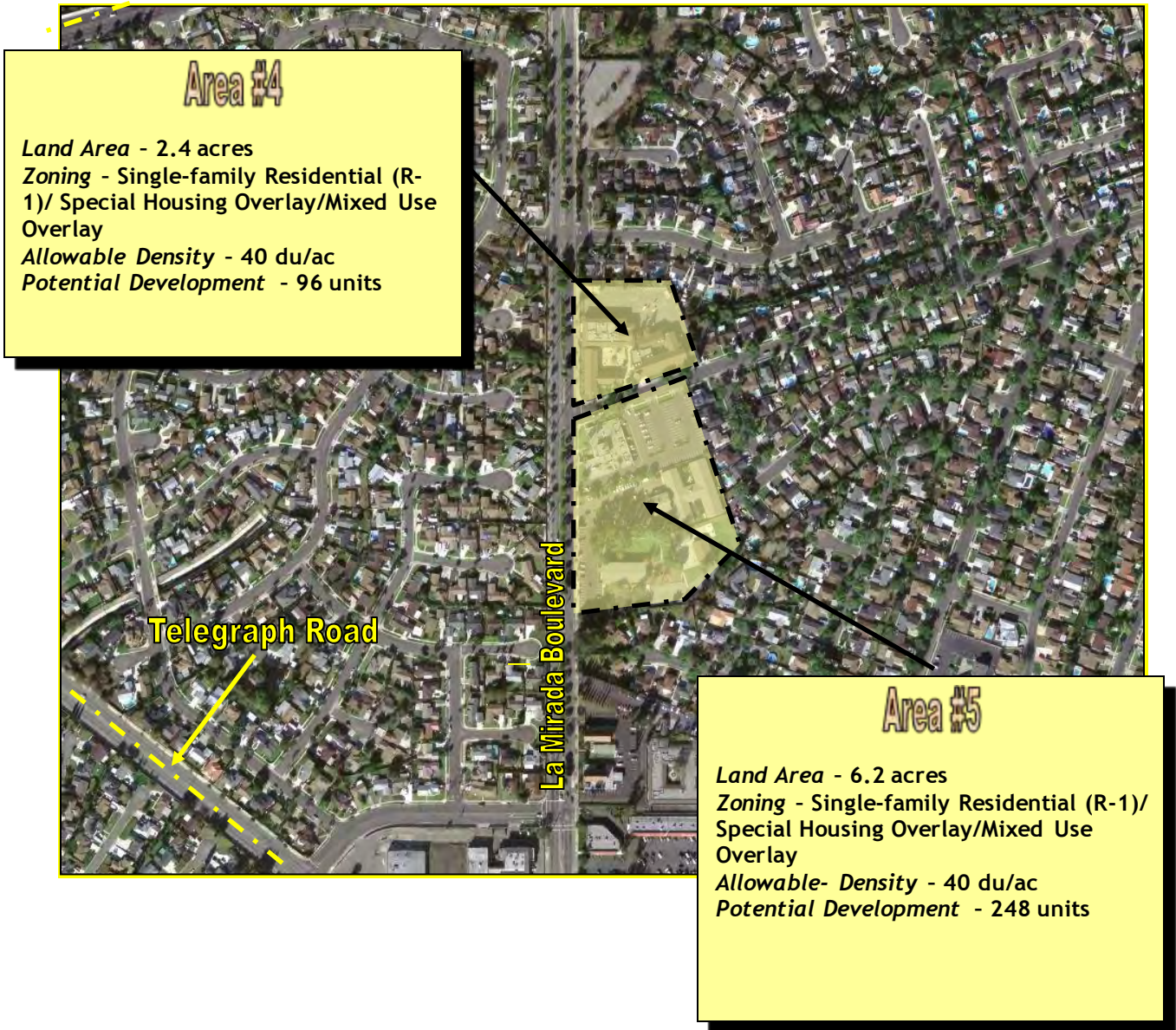


### Area #3

*Land Area* - 3.3 acres  
*Zoning* - Single-Family Residential (R-1), Neighborhood Commercial (C-1)/Special Housing Overlay/Mixed Use Overlay  
*Allowable Density* - 40 du/ac  
*Potential Development* - 132 units

## EXHIBIT 8 HOUSING INFILL AREA - #3

SOURCE: BLODGETT/BAYLOSIS ASSOCIATES



**EXHIBIT 9**  
**HOUSING INFILL AREAS - #4 AND #5**  
SOURCE: BLODGETT/BAYLOSIS ASSOCIATES

Attachment: City of La Mirada 2013-2021 Housing Element (Appeal of the Draft RHNA Allocation for the City of La Mirada)



**Area #6**

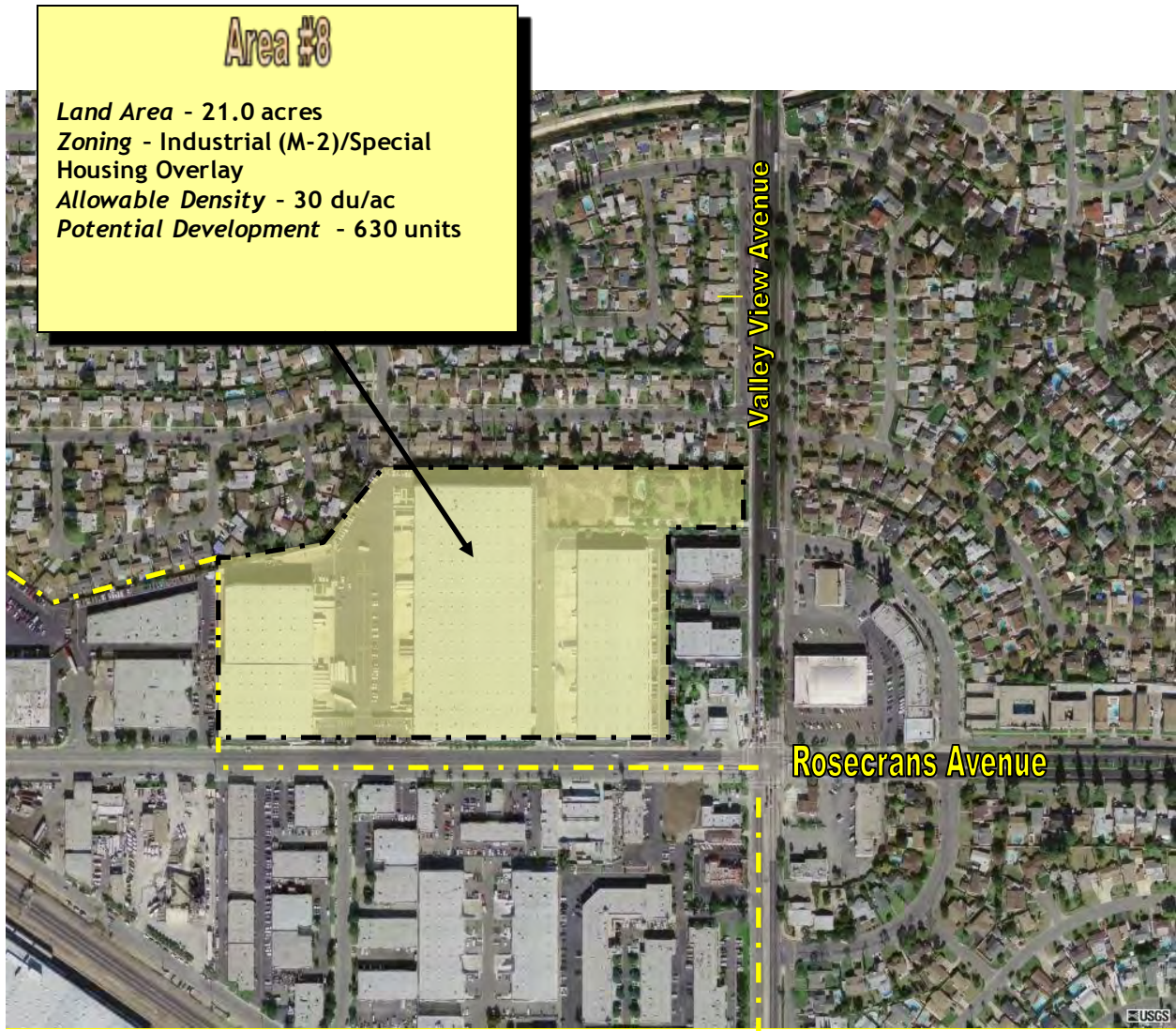
*Land Area - 5.9 acres*  
*Zoning - Imperial Highway Specific Plan PA-3A/*  
*Allowable Density - 15 units/acre*  
*Potential Development - 89 units*

**EXHIBIT 10**  
**HOUSING INFILL AREA - #6**  
SOURCE: BLODGETT/BAYLOSIS ASSOCIATES





**EXHIBIT 11**  
**HOUSING INFILL AREA - #7**  
SOURCE: BLODGETT/BAYLOSIS ASSOCIATES



**EXHIBIT 12**  
**HOUSING INFILL AREA - #8**  
SOURCE: BLODGETT/BAYLOSIS ASSOCIATES



**EXHIBIT 13**  
**HOUSING INFILL AREA - #9**  
SOURCE: BLODGETT/BAYLOSIS ASSOCIATES



## 4.4 HOUSING GOALS AND POLICIES

### 4.4.1 HOUSING GOALS

The La Mirada City Council adopted a series of formal housing goals as part its most recent General Plan Update. These goals, which give direction to the City's housing program, include the following:

- **Goal 1.** The City of La Mirada shall preserve the single-family residential character of the community.
- **Goal 2.** The City of La Mirada shall limit multi-family developments to buffer areas between commercial and single-family residential districts.
- **Goal 3.** The City of La Mirada shall encourage development of housing for all social and economic segments of the City.
- **Goal 4.** The City of La Mirada shall encourage creative and innovative residential development both in terms of structural design and utilization of land area.
- **Goal 5.** The City of La Mirada shall protect the health, safety, and welfare of all citizens by through code and ordinance enforcement in the elimination of substandard housing conditions and zoning ordinance violations.
- **Goal 6.** The City of La Mirada shall diligently explore new methods of enforcement to eliminate the possibility of substandard and deteriorating housing conditions.

In order to progress toward the attainment of established goals, the City has committed itself to specific policies and actions. While the goals are general statements that reveal community values or ideals, the policies presented herein are more specific, time-oriented actions. The policies and supporting actions have been organized around five major issue areas identified by the State Department of Housing and Community Development. The actions to be undertaken by the City have been programmed to facilitate implementation and evaluate progress. The anticipated impact, responsible agency, potential funding, and schedule for each action are discussed.

### 4.4.2 ISSUE NO. 1. POLICIES FOR HOUSING AND NEIGHBORHOOD PRESERVATION

The following policies will be effective in promoting housing preservation :

- **Policy 1.1.** The City of La Mirada shall encourage the maintenance and rehabilitation of existing owner-occupied and rental housing, where feasible.
- **Policy 1.2.** The City of La Mirada shall promote the removal and replacement of those substandard units which cannot be rehabilitated.



- **Policy 1.3.** The City of La Mirada shall upgrade or improve community facilities and municipal services in keeping with community needs.
- **Policy 1.4.** The City of La Mirada shall sustain a high standard of maintenance for all publicly-owned property.
- **Policy 1.5.** The City of La Mirada shall investigate and pursue programs and funding sources available to assist in the improvement of residential property.
- **Policy 1.6.** The City of La Mirada shall prevent the encroachment of incompatible uses into established residential areas.

#### **4.4.3 ISSUE NO. 2: POLICIES FOR AFFORDABLE HOUSING**

The underlying policies will be effective in preserving the affordability of housing:

- **Policy 2.1.** The City of La Mirada shall promote and, where possible, require the continued affordability of all residential units that may be produced with participation by the City or its authorized agents.
- **Policy 2.2.** The City of La Mirada shall discourage the conversion of existing apartment units to condominiums where such conversion will diminish the supply of low- and moderate-income housing.
- **Policy 2.3.** The City of La Mirada shall investigate and pursue programs and funding sources designed to maintain and/or improve the affordability of existing housing units to low- and moderate-income households.

#### **4.4.4 ISSUE NO. 3: POLICIES FOR THE PROVISION OF NEW DEVELOPMENT SITES**

The successful implementation of the following policies will ensure the provision of adequate, suitable sites for the construction of new housing.

- **Policy 3.1.** The City of La Mirada shall use the Land Use Element of the General Plan and the zoning ordinance to ensure the availability of adequate sites for a variety of housing types.
- **Policy 3.2.** The City of La Mirada shall ensure the compatibility of residential areas with surrounding uses through the separation of incompatible uses, construction of adequate buffers, and other land use controls.
- **Policy 3.3.** The City of La Mirada shall encourage the infilling of vacant residential land.
- **Policy 3.4.** The City of La Mirada shall encourage the recycling of underutilized residential land, where such recycling is consistent with established land use plans.



- **Policy 3.5.** The City of La Mirada shall ensure that all residential areas are provided with adequate public facilities and services.
- **Policy 3.6.** The City of La Mirada shall ensure that adequate, freely accessible open space is provided within reasonable distance of all community residents.
- **Policy 3.7.** The City of La Mirada shall encourage the construction of low- and moderate-income housing to sites which are located with convenient access to schools, parks, public transportation, shopping facilities, and employment opportunities.

#### **4.4.5 ISSUE NO. 4. FAIR HOUSING**

In order to assure accessibility to decent housing for all persons, the City of La Mirada shall support the following policies related to fair housing practices.

- **Policy 4.1.** The City of La Mirada shall encourage the development of housing which meets the special needs of handicapped and elderly households.
- **Policy 4.2.** The City of La Mirada shall promote the provision of housing to meet the needs of families of all sizes and encourage the provision of rental units for families with children.

#### **4.4.6 ISSUE NO. 5. NEW HOUSING OPPORTUNITIES**

To ensure the adequate provision of housing for all economic segments of the community, the City of La Mirada shall implement the following policies.

- **Policy 5.1.** The City of La Mirada shall protect and expand housing opportunities for households needing assistance, including senior citizens, low- and moderate-income families, and handicapped persons.
- **Policy 5.2.** The City of La Mirada shall encourage the use of innovative land use techniques and construction methods to minimize housing costs without compromising basic health, safety, and aesthetic considerations.
- **Policy 5.3.** The City of La Mirada shall strive to provide incentives and encourage the private development of new affordable housing for low- and moderate-income households.
- **Policy 5.4.** The City of La Mirada shall investigate and pursue programs and funding sources designed to expand housing opportunities for low- and moderate-income households, including first-time home buyers, the elderly and persons with disabilities.
- **Policy 5.5.** The City of La Mirada shall facilitate the construction of low- and moderate-income housing to the extent possible.



- **Policy 5.6.** The City of La Mirada shall periodically reexamine local building and zoning codes for possible amendments to reduce construction costs without sacrificing basic health and safety considerations.

## 4.5 HOUSING PROGRAMS

This section of the Housing Element describes those programs that will aide the City in realizing its adopted housing policy.

### 4.5.1 HOME IMPROVEMENT PROGRAM

The Home Improvement Program (HIP) is a home assistance program for low- to moderate-income La Mirada homeowners to assist in the correcting of violations and repair deteriorating conditions. The assistance is provided through an emergency grant and a low-interest deferred loan. Funding is based on first-come basis. This loan is designed for exterior and/or interior repairs and as a means to address immediate health and safety risks, such as a leaky roof, broken water or sewer pipes, lack of cold/hot water, broken or clogged waste lines, and broken or cracked gas lines. The maximum loan amount is \$30,000, with 3% annual simple interest. The loan is secured by a deed of trust and does not need to be repaid until the property is sold, refinanced, no longer owner-occupied, or ownership is transferred. At that time, the loan balance and interest accrued are due and payable. To qualify for assistance, both the homeowner and the property must satisfy specific eligibility criteria.

- Applicant must be on title and occupy the property.
- Total gross household income must not exceed the annual income limits based on household size.

All participating properties receiving a low-interest deferred loan are subject to lead-based paint and asbestos regulations. If tests are positive, a grant of up to \$1,500 is available for the abatement of the lead and/or asbestos. The following requirements are applicable in the issuance of the loan:

- The home must be a single-family detached home or a mobile home in the City of La Mirada.
- The home must be in need of repairs to correct existing code violations, protect structural integrity of the property, promote neighborhood safety, and/or provide exterior/interior improvements.
- The home **must have a homeowner's insurance policy for full replacement value** and all property taxes must be paid.
- Any liens and encumbrances on the property must not exceed 80% of fair-market-value at the **time of application, 85% including the City's assistance.**



The program’s implementation will include the following elements.

- *Responsible Agency.* Housing Division
- *Funding.* CDBG
- *Implementation Schedule.* Annually
- *Quantified Objectives.* 5 units

#### 4.5.2 MORTGAGE CREDIT CERTIFICATE PROGRAM

The County of Los Angeles’ Mortgage Credit Certificate Program (MCC) offers first-time home buyers a federal income tax credit. The credit reduces the amount of federal taxes the certificate holder would pay. It can assist the first-time home buyer to qualify for a loan by allowing a lender to reduce the housing expense ratio by the amount of the tax. **This program is advertised on the City’s website.**

- *Responsible Agency.* Los Angeles County CDC
- *Funding.* CDBG
- *Implementation Schedule.* Annually
- *Quantified Objectives.* 5 units

#### 4.5.3 LOS ANGELES COUNTY PROGRAMS

The County of Los Angeles’ Home Ownership Program (HOP) provides assistance to low-income, first-time home buyers in purchasing a home. The HOP provides loans of up to 25% of the initial purchase price. In designated areas additional down payment and closing cost assistance may be provided. The loans are shared equity loans with no monthly payments. The Southern California Home Financing Authority Revenue Bond Program (SCHFA) is a joint powers authority providing mortgage loans for low- and moderate-income first-time home buyers. The program offers below market fixed rate mortgages at reduced fees. **The program’s implementation will include the following elements.**

- *Responsible Agency.* Los Angeles County CDC
- *Funding.* CDBG
- *Implementation Schedule.* Annually
- *Quantified Objectives.* 5 units

#### 4.5.4 EXTREMELY LOW INCOME HOUSING PROGRAM

This program reflects a number existing initiatives that support the provision of housing for households with very-low and low incomes. As indicated in Section 2, there are a number of extremely low income households that require affordable housing. Under this program, the City will prioritize affordable housing funds towards the provision of housing for extremely low income households. A primary objective of this program is to promote the development of housing units for households earning 30 percent or less of the *Median Family Income* for Los Angeles County. Specific emphasis will be placed on the provision of family housing and non-traditional housing types such as single-room occupancy units and transitional housing. A second element of this program is the *Housing Choice Voucher Program*, a





federally funded rental program that assists very low-income families, elderly, and disabled households. **This program will be an important element in the City’s Extremely Low Income Housing Program.** Decent, safe, and sanitary housing units are provided to households through rental vouchers. Participants may find their own housing including single-family homes, townhouse, and apartments. Participants are able to select any housing that meets the requirements of the program, and is not limited to units located in subsidized housing projects.

- **Responsible Agency:** Planning Division/County of Los Angeles
- **Funding:** Section 8 (for the Vouchers)
- **Implementation Schedule.** Ongoing
- **Quantified Objectives.** 120 vouchers.

#### 4.5.5 UNDERUTILIZED SITES PROGRAM

Under this program, La Mirada will proactively encourage the development of underutilized residentially zoned properties within the City. The City will offer regulatory incentives such as relaxed development standards (i.e., building setbacks, height, floor area ratio, parking, etc.), expedited permit processing for projects that contain an affordable housing component, and other incentives. The City will also promote the availability of underutilized sites along with the available incentives through the use of handouts and the City’s website. In addition, information concerning the program will be provided at pre-application meetings with developers and during other community outreach meetings. Finally, the City will monitor the supply of underutilized sites and evaluate whether the incentives are effective in promoting the **program’s** implementation. The key elements of this program include the following:

- The City will continue to provide appropriate land use designations consistent with regional housing needs for mixed use and infill development.
- The City will maintain an inventory of potential sites to provide developers with information regarding development incentives for affordable units. The City will evaluate the feasibility of a sliding density scale **that would “award” a developer additional development densities if he/she** were able to expand the size of the development site either through outright acquisitions or inviting participation of a neighboring property owner.
- The City will identify development opportunities, explore and establish, as appropriate, concessions and incentives beyond density bonus law, and allocate financial resources when available to facilitate lot consolidation.
- The City will provide technical assistance and information to private and non-profit housing providers regarding available City-owned parcels that will be suitable for lower-income development.
- The City will facilitate the assembly and recycling of underutilized properties for new affordable housing construction through technical assistance to developers and property owners. Technical assistance includes land development counseling by City planners and a marketing brochure that provides information on available development incentives.



The key elements of this program’s implementation are described below.

- **Responsible Agency:** Planning Division
- **Funding:** General Fund
- **Implementation Schedule.** With the first year of the planning period, establish program elements. Annually review of progress/Program Adjustments.
- **Quantified Objectives.** The outreach materials will be completed within 12-months of the Housing Element’s adoption.

#### 4.5.6 HOUSING INFILL SITES MONITORING PROGRAM

To ensure adequate sites are available throughout the planning period to meet the City’s RHNA, the City will continue to annually update an inventory that details the amount, type, and size of vacant and underutilized parcels to assist developers in identifying land suitable for residential development and that also details the number of extremely low, very low, low, and moderate-income units constructed annually. If the inventory indicates a shortage of available sites, the City shall rezone sufficient sites to accommodate the City’s RHNA.

To ensure sufficient residential capacity is maintained to accommodate the RHNA need, the City will develop and implement a formal ongoing (project-by-project) evaluation procedure pursuant to Government Code Section 56863. Should an approval of development result in a reduction of capacity below the residential capacity needed to accommodate the remaining need for lower-income households, the City will identify and zone sufficient sites to accommodate the shortfall. The key elements of this program’s implementation are described below.

- **Responsible Agency:** Planning Division
- **Funding:** General Fund
- **Implementation Schedule.** Ongoing
- **Quantified Objectives.** An annual report will be prepared than indicates progress.

#### 4.5.7 EQUAL HOUSING PROGRAM

The City of La Mirada works with the Fair Housing Foundation (with offices in both Los Angeles and Long Beach) to resolve disputes concerning housing discrimination and to educate residents and property owner regarding laws relating to equal housing opportunities. The City will continue to make referrals to the Fair Housing Foundation for housing discrimination. Currently, the City maintains referral information on the City’s website and brochures at the Civic Center. The program’s implementation will include the following elements.

- **Responsible Agency.** Housing Division
- **Funding.** General Fund
- **Implementation Schedule.** Ongoing
- **Quantified Objectives.** 100% referrals



#### 4.5.8 RESOURCE CONSERVATION PROGRAM

There are a number of implementing programs that, in addition to providing for new opportunities for housing, also have the added benefit of promoting resource conservation. For example, the areas that have been identified for new infill residential development are located near arterial roadways that are currently serviced by public infrastructure. In addition, the sites are served by public transit that will further reduce the vehicle miles traveled by prospective residents. In addition, these infill areas have been designated for higher residential densities of up to 30 units per acre. An important element of any energy conservation measure will be to identify strategies for retrofitting energy conserving devices in both new residential development and in the rehabilitation of existing development. The City of La Mirada will continue to promote energy and resource conservation through the following:

- State law requires that older bathroom toilet fixtures that consume more water be phased out and replaced with toilets that use only 1.6 gallons per flush. As part of the counter review of housing unit rehabilitation, staff will review development plans to ensure compliance with these requirements.
- La Mirada will continue to implement the landscape design ordinance that encourages the use of plant materials that consist of drought tolerant plants thus further reducing water consumption in landscaping.
- The City shall support the installation of photovoltaic/solar and solar water heating systems on new residential construction as a means to promote a reduction in energy consumption.
- **The City's** website will be expanded to include a discussion of energy conservation measures and devices that, in addition to saving energy, will also save the homeowner or renter money.
- *Responsible Agency.* Housing Division
- *Funding.* General Fund
- *Implementation Schedule.* New Program
- *Quantified Objectives.* Water and Energy Conservation

#### 4.5.9 SUPPORT FOR PERSONS WITH DEVELOPMENTAL DISABILITIES

The City will support the ability of persons with developmental disabilities to live in integrated community settings by working with the Eastern Los Angeles Regional Center to identify the housing needs of persons served by the Center, promote opportunities for supportive living services and support efforts to eliminate barriers to housing for persons with developmental disabilities.

- *Responsible Agency.* Planning Division
- *Funding.* General Fund
- *Implementation Schedule.* Ongoing
- *Quantified Objectives.* Appropriate housing for persons with developmental disabilities

#### 4.5.10 MONITORING OF AT-RISK UNITS



The City of La Mirada will work collaborative with regional, state and federal agencies to ensure the continued provision of rental assisted units in the City. To ensure proper monitoring of units, the City will coordinated with applicable agencies to ensure identification of existing units and evaluate potential for providing additional opportunities in the future. The City of La Mirada will annually evaluate units at risk of converting to market rent and seek methods to ensure their continued availability.

- *Responsible Agency.* Planning Division
- *Funding.* General Fund
- *Implementation Schedule.* Annual review of potential at-risk units.

#### 4.6 QUANTIFIED HOUSING OBJECTIVES

Table 25 below indicates the quantified objective for new housing development in the City intends to accomplish as part of the City’s housing strategy.

| Income category | Construction                   | Rehabilitation                | Preservation/<br>Conservation |
|-----------------|--------------------------------|-------------------------------|-------------------------------|
| Extremely Low   | 31 (subset of very low income) | 40 (Home Improvement Program) |                               |
| Very Low        | 62                             |                               |                               |
| Low             | 37                             |                               | 74 (La Mirada Vistas)         |
| Moderate        | 40                             |                               |                               |
| Above Moderate  | 96                             |                               |                               |
| Total           | 235                            | 40                            | 74                            |

#### 4.7 PROGRESS IN HOUSING ELEMENT’S IMPLEMENTATION

The City’s previous Housing Element anticipated that a total of 1,751 new units would be constructed during the 2006-2014 planning period. Of these units, 732 units would be for lower income households and 303 units would be for moderate income households. In addition, the City established a goal for rehabilitation of 105 units and conservation of 5 units. Table 26 shows the City’s progress in achieving its quantified objectives, as of December 2013.



**Table 26  
Progress in Achieving Quantified Objectives**

| Income Category      | Objective for Previous Element |                |              | Achievement to Date |                |              |
|----------------------|--------------------------------|----------------|--------------|---------------------|----------------|--------------|
|                      | Construction                   | Rehabilitation | Conservation | Construction        | Rehabilitation | Conservation |
| Extremely Low-Income | 226                            | 5              | 5            | 0                   | 111            | 25           |
| Very Low-Income      | 226                            |                |              | 0                   |                |              |
| Low-Income           | 280                            | 100            | 0            | 0                   |                |              |
| Moderate-Income      | 303                            | 0              | 0            | 0                   |                |              |
| Above Moderate       | 716                            | 0              | 0            | 4                   |                |              |
| <b>Total</b>         | <b>1,751</b>                   | <b>105</b>     | <b>5</b>     | <b>4</b>            | <b>111</b>     | <b>25</b>    |

Notes:

1. The objective of 5 Conservation units were units that were supposed to receive funds from the Foster Park Home Improvement Program which was combined with the regular Home Improvement Program during the planning period.

As part of the preparation of this Housing Element, the adopted housing policies and programs were reviewed to consider their continued relevance. Table 27 indicates the 2006-2014 Housing Element policies and programs and the City’s progress in implementation.

**Table 27  
Evaluation of 2006-2014 Housing Element Policy Program**

| Program  | Implementation Status   |
|--|---|
| <p>4.5.1 Home Improvement Program</p> <p>The Home Improvement Program (HIP) is a home assistance program for low- to moderate-income La Mirada homeowners to assist in the correcting of violations and repair deteriorating conditions. The assistance is provided through an emergency grant and a low-interest deferred loan. Funding is based on first-come basis. This emergency grant is for specific emergency repairs up to \$5,000 as a means to address immediate health and safety risks, such as a leaky roof, broken water or sewer pipes, lack of cold/hot water, broken or clogged waste lines, and broken or cracked gas lines. This loan is designed for exterior and/or interior repairs and improvements. The maximum loan amount is \$30,000, with 3% annual simple interest. The loan is secured by a deed of trust and does not need to be repaid until the property is sold, refinanced, no longer owner-occupied, or ownership is transferred. At that time, the loan balance and interest accrued are due and payable. To qualify for assistance, both the homeowner and the property must satisfy specific eligibility criteria.</p> <ul style="list-style-type: none"> <li>• Applicant must be on title and occupy the property.</li> </ul> | <p>The City continues to use CDBG funds to provide low-interest deferred loans to qualified low-income home owners for the improvement of deteriorated interior and exterior "non-luxury" conditions and code violations at single-family and mobile home residences.</p> <p>In FY 2011-13, 5 housing units were assisted through this program.</p> |



**Table 27  
Evaluation of 2006-2014 Housing Element Policy Program**

| Program  | Implementation Status |
|--|-----------------------|
| <ul style="list-style-type: none"> <li>Total gross household income must not exceed the following 2007-08 income limits based on household size.</li> </ul> <p>All participating properties receiving a low-interest deferred loan are subject to lead-based paint and asbestos regulations. If tests are positive, a grant of up to \$2,500 is available for the abatement of the lead and/or asbestos. The following requirements are applicable in the issuance of the loan:</p> <ul style="list-style-type: none"> <li>The home must be a single-family detached home or a mobile home in the City of La Mirada.</li> <li>The home must be in need of repairs to correct existing code violations, protect structural integrity of the property, promote neighborhood safety, and/or provide exterior/interior improvements.</li> <li><b>The home must have a homeowner's insurance policy</b> for full replacement value and all property taxes must be paid.</li> <li>Any liens and encumbrances on the property must not exceed 80% of fair-market-value at the time of application, <b>85% including the City's assistance.</b></li> </ul> <p>Quantified Objectives: 5 units</p> |                       |



**Table 27  
Evaluation of 2006-2014 Housing Element Policy Program**

| Program  | Implementation Status  |
|--|--|
| <p>4.5.2 Foster Park Home Improvement</p> <p>The Foster Park Home Improvement Program are designed to assist eligible homeowners in the Foster Park neighborhood as a means to improve deteriorating conditions of their property and correct existing code violations. This loan is designed for exterior and/or interior repairs and improvements. The maximum loan amount is \$30,000, with 3% annual simple interest. The loan is secured by a deed of trust and does not need to be repaid until the property is sold, refinanced, no longer owner-occupied, or ownership is transferred. At that time, the loan and interests are due and payable. To qualify for assistance, both the homeowner and the property must be a single-family detached home located within the Foster Park Neighborhood in the City of La Mirada, the applicant must be on title and occupy the property, and the total gross household income must not exceed the following 2006-07 income limits based on household size.</p> <p>Homeowners may participate in all programs they may be eligible for, but may only participate in each type of assistance once. Other requirements include the following:</p> <ul style="list-style-type: none"> <li>• All improvements must be completed within 90 working days of issuance of Notice of Proceed.</li> <li>• All contractors performing work must have a current <b>State Contractor's License and the City's business license.</b></li> <li>• Improvements completed prior to the funding of the grant/loan cannot be reimbursed by the assistance program.</li> </ul> <p>All participating properties receiving a low-interest deferred loan or a grant are subject to lead-based paint and asbestos regulations. If tests are positive, a grant of up to \$2,500 is available for the abatement of the property.</p> <p>Quantified Objectives: 5 units</p> | <p>The Foster Park Home Improvement Program <b>was combined with the City's regular Home Improvement Program</b> during the Planning Period. Separate funding has been discontinued.</p>   |
| <p>4.5.3 Affordable Home Ownership Program</p> <p>Affordable Home Ownership Program (AHOP) - Funded by the La Mirada Redevelopment Agency, AHOP provides a below market purchase price on certain 1 and 2-bedroom condominiums to up to moderate-income first-time homebuyers. The program is not currently accepting applications.</p> <p>Quantified Objectives: 5 units</p>  | <p>The La Mirada Redevelopment Agency was dissolved in 2012, consistent with the dissolution of redevelopment agencies statewide. As a result, the Affordable Home Ownership Program was not funded and has been discontinued.</p> |
| <p>4.5.4 Mortgage Credit Certificate Program</p> <p><b>The County of Los Angeles' Mortgage Credit Certificate Program (MCC)</b> offers first-time home buyers a federal income tax credit. The credit reduces the amount of federal taxes the certificate holder would pay. It can assist the first-time home buyer to qualify for a loan by allowing a lender to reduce the housing expense ratio <b>by the amount of the tax. This program is advertised on the City's website.</b></p>  | <p>The City continues to promote the Mortgage Credit Certificate Program through <b>information on the City's website.</b></p>   |



**Table 27  
Evaluation of 2006-2014 Housing Element Policy Program**

| Program   | Implementation Status  |
|---|--|
| Quantified Objectives. 5 units  |  |
| <p>4.5.5 Los Angeles County Programs</p> <p><b>The County of Los Angeles' Home Ownership Program (HOP)</b> provides assistance to low-income, first-time home buyers in purchasing a home. The HOP provides loans of up to 25% of the initial purchase price. In designated areas additional down payment and closing cost assistance may be provided. The loans are shared equity loans with no monthly payments. The Southern California Home Financing Authority Revenue Bond Program (SCHFA) is a joint powers authority providing mortgage loans for low- and moderate-income first-time home buyers. The program offers below market fixed rate mortgages at reduced fees.</p> <p>Quantified Objectives. 5 units</p>  | <p>The City continues to promote the County's Home Ownership Program through <b>information on the City's website. The program</b> provides a 2nd Trust Deed loan at 0% interest with all payments deferred until sale, transfer, refinancing, or full repayment of the first mortgage. Qualified home buyers in La Mirada receive \$60,000 or 20% of the purchase price, whichever is less.</p> |
| <p>4.5.6 Transitional Housing Program</p> <p>Transitional housing is a type of supportive housing used to facilitate the movement of homeless individuals and families to permanent housing. A person may live in a transitional housing unit for up to two-years while receiving supportive services that enable independent living. To comply with State law, the City will amend the Zoning Ordinance requirements for the residential zone districts so that the development of transitional housing will be treated as a residential use within all zone districts that permit residential uses. The development standards that will apply to transitional housing will be the same as those that are applicable to similar uses within the zones. Candidate units and/or sites within the residential zones will have the following characteristics that are relevant to transitional housing:</p> <ul style="list-style-type: none"> <li>• Transitional housing will be subject to the same permitting procedures as that required for other permitted uses for the zone without undue special regulatory requirements.</li> <li>• The residential zones were selected because of their proximity to transportation service providers, schools, parks, and other public services and facilities.</li> <li>• Parking requirements, fire regulations, and design standards for transitional housing will be the same as that required for the corresponding residential zone districts. As a result, the applicable development standards will not impede the efficient use of the site as transitional housing.</li> </ul> <p>To comply with State law, the City of La Mirada will amend the Zoning Ordinance so that transitional housing will be a permitted <b>use in all of the City's zone districts that permit residential uses.</b> Following this amendment, transitional housing will be permitted in all residential zones and subject to those restrictions that are applicable to the other residential uses in the same zone.</p> <p>Objectives. Comply with applicable State requirements.</p> | <p>In 2008, the City amended its Zoning Code to permit transitional housing in the residential zoning districts.</p>   |





**Table 27  
Evaluation of 2006-2014 Housing Element Policy Program**

| Program  | Implementation Status  |
|--|--|
| <p>4.5.7 Supportive Housing Programs</p> <p>Supportive housing refers to permanent rental housing that also provides a wide array of support services that are designed to enable residents to maintain stable housing and lead more productive lives.</p> <p>Supportive housing is most often targeted to persons that have greater risk factors such as mental illness or drug dependence that could ultimately lead to prolonged homelessness. The types of support services that may be provided include medical and mental health care, vocational and employment training, substance abuse counseling, childcare, and independent living skills training. Most supportive housing is constructed and managed by non-profit housing developers in partnership with non-profit service providers. However, the State requires that local governments take a proactive role in facilitating the review and approval process. The State also requires the Housing Element to identify zones that allow supportive housing development and demonstrate that zoning, local regulations (standards and the permit process) encourage and facilitate supportive housing. Supportive housing may include a single family detached unit or an apartment building. To comply with State law, the City of La Mirada will amend the Zoning Ordinance so that supportive housing will be <b>created as a residential use in all of the City's Zone districts that</b> permit residential uses. Following this amendment, supportive housing will be permitted in all residential zones and subject to those restrictions that are applicable to similar uses in the same zone.</p> <p>Objectives. Comply with applicable State requirements.</p> | <p>In 2008, the City amended its Zoning Code to permit supportive housing in the residential zoning districts.</p>   |
| <p>4.5.8 Single Room Occupancy Housing Program</p> <p>A single room occupancy (SRO) development SROs may serve as an important source of affordable housing for lower-income individuals, seniors, and persons with disabilities. An SRO unit usually is small ranging in size from 200 square feet to 350 square feet. Many of the older SROs have been lost due to deterioration, hotel conversions, and demolition. As a means to finance this program, the City will prioritize affordable housing funds towards the provision of housing for extremely low income households as part of the development of SRO housing. The purpose of this <b>program is to establish appropriate regulations in the City's Zoning Ordinance that would permit SRO development in the City's</b> multiple-family zones as well as in those areas where mixed use development is contemplated.</p> <p>Quantified Objectives. Comply with applicable State requirements.</p>   | <p>In 2012, the City amended its Zoning Code to permit single room occupancy (SRO) units in the Mixed Use Overlay (MUO) zoning district and established development standards for the type of development.</p>   |
| <p>4.5.9 Emergency Housing Program</p> <p>The City of La Mirada will initiate a program in response to the requirement of SB2 concerning the designation of an area where an emergency shelter must be permitted by right. The City intends to use a new Overlay Zone District as a means to comply with the requirements of SB 2 that call for specific geographic areas of the City to be assigned a land use designation that permits emergency shelters by right. The City will amend the Zoning Ordinance to permit emergency shelters in the M-2 (industrial) zone located to</p>  | <p>In 2012, the City adopted the Emergency Shelter Overlay (ESO) zoning district to permit emergency shelters. The ESO zoning district applies to that area south of the Interstate 5 (I-5 Santa Ana Freeway) designated as industrial (M-2) zone on the official zoning map of the City of La Mirada.</p> |



**Table 27  
Evaluation of 2006-2014 Housing Element Policy Program**

| Program   | Implementation Status  |
|---|--|
| <p>the south of the Santa Ana Freeway. The proposed Zoning Ordinance amendment will involve the creation of an Overlay Zone that will permit emergency housing by right. The location of this Overlay Zone is shown in the Appendix. This zone was specifically selected because of its proximity to transportation, public services, and the underlying uses that could more easily accommodate the use. The area is also located close to the I-5 corridor which is a major source of employment in the area. In addition, the greatest concentration of employers in the City is located in the vicinity. This program will also promote public awareness regarding homelessness in the community and will assist in the development of a referral system.</p> <p>Objectives. Comply with applicable State requirements.</p>   |  |
| <p>4.5.10 Zoning Ordinance Revision Program</p> <p><b>The City intends to amend the City's Zoning Ordinance and General Plan to would permit those land uses and procedures envisioned as part of the Housing Element's implementation.</b> As part of this Zoning Ordinance revision process, the City will examine certain development standards, such as parking requirements, to determine if a relaxation of these requirements is feasible as a means to reduce the cost of new multiple-family construction. The Zoning Ordinance revision will also include the development of a new overlay designation that will permit the implementation of the mixed-use developments anticipated as part of the Housing Element's implementation. Finally, the Zoning Ordinance revision will outline other new development review procedures as a means to encourage new residential development. The City, as part of the review and revision of the Zoning Ordinance, will revise the CFC procedures so that the review process is ministerial in nature instead of the current discretionary review requirement. Under this revised process, the review process will function similar to a conventional design review process though the staff determination may be appealed to the Planning Commission. This change in the CFC process will reduce the processing time and cost for new residential development.</p> <p>La Mirada is predominantly developed in residential land uses and <b>the City's neighborhoods were developed during different</b> periods at varying architectural styles and densities. The City does not impose a preferred architectural style. To ensure that new and substantial rehabilitation of housing is completed in an appropriate manner with respect to scale, size, and character, the City will incorporate new design guidelines and standards into the updated Zoning Ordinance. These design guidelines are necessary for individual projects as a means to facilitate ministerial review of residential projects, including single-family, multiple family, and other residential uses. These guidelines will also aid in the transition from the existing CFC discretionary review process which is presently functioning as design review.</p> <p>Mixed/multi-use-projects require careful planning to ensure that they exhibit high quality development that is compatible with adjacent development. Following the adoption of the Housing Element, the City will use the Zoning Ordinance revision as a means to create development standards for mixed/multi-use housing suitable for the identified infill/overlay development sites. The standards that will be included in the Zoning Ordinance</p> | <p>In 2012, the City adopted the Mixed Use Overlay (MUO) zoning district that permits mixed-use development as well as stand-alone residential development. The Mixed Use Overlay has been applied to sites identified in <b>the City's 2006-2014 Housing Element in order to accommodate the City's RHNA need.</b></p> <p>The City also adopted the Special Housing Overlay (SHO) district is to provide additional opportunities for new housing in specific areas of the City where higher density development may be accommodated. Infill Areas 1 through 9 identified in the Housing Element are included in the SHO.</p> |



**Table 27  
Evaluation of 2006-2014 Housing Element Policy Program**

| Program   | Implementation Status |
|---|-----------------------|
| <p>include density standards, open space requirements, parking standards (including flexible standards based on parking demand), floor area ratios, building height standards, building setback standards, density standards, and the relaxation of certain standards to facilitate lot consolidation.</p> <p>The Zoning Ordinance revision would involve the creation of a new Residential Mixed-Use Overlay designation that would permit conventional mixed use development that would involve ground level commercial uses with residential units in the above ground levels, infill developments consisting of entirely residential land uses, and developments where residential units and commercial uses would share the same parcel. In addition, single room occupancy (SRO) developments would be permitted pursuant to State law. The areas that will be subject to this rezoning is identified in Section 4.3.2 Housing Infill Program.</p> <p>To ensure the availability of adequate sites to accommodate estimated future construction need by income category, the City shall ensure the mixed use overlay provides adequate sites to meet projected need by income category for the 2006-2014 planning period. <b>Specifically, the City's mixed use designation will provide adequate sites to accommodate the remaining regional housing need for extremely low income, very low income, and low income households.</b> The amended land use designations and associated zoning district classification will permit multifamily uses as a matter of right, not subject to a conditional use permit, planned unit development or other non-design related discretionary review. To accommodate units that will be affordable to lower income households, minimum standards shall be applied to each area. The minimum densities for each of the nine infill areas include the following:</p> <ul style="list-style-type: none"> <li>Area 1 – 45 units per acre</li> <li>Area 2 – 45 units per acre</li> <li>Area 3 – 40 units per acre</li> <li>Area 4 – 40 units per acre</li> <li>Area 5 – 40 units per acre</li> <li>Area 6 – 15 units per acre</li> <li>Area 7 – 30 units per acre</li> <li>Area 8 – 30 units per acre</li> <li>Area 9 – 30 units per acre</li> </ul> <p>The development standards and other regulatory provisions associated with the revised land use designations/classifications shall maximize development capacity and promote a variety of housing types at various levels of affordability. The unmet projected regional share of lower-income need of 732 units shall be accommodated on sites with densities and development standards that permit at least 16 units per site. To ensure the accommodation of 50% of the unmet RHNA lower income need (367 units) on sites zoned for residential only use, the revised Zoning Ordinance will include an overlay zone permitting exclusive residential use. Non-residential uses within the overlay zone shall not be a permitted use. Any applications for non-residential uses within the housing overlay zone shall be required to obtain a <b>Conditional Use Permit (CUP) to ensure the City's unmet regional share of lower-income need can be met on other sites zoned for residential only sites.</b> Prior to any discretionary conditional</p> |                       |



**Table 27  
Evaluation of 2006-2014 Housing Element Policy Program**

| Program   | Implementation Status  |
|---|--|
| <p>approvals for non-residential development projects within the overlay zone, specific findings shall be made demonstrating the conditional approval of non-residential development within the overlay zone will not reduce or eliminate the capacity to accommodate 50% of the unmet RHNA lower income need on sites zoned for residential only use. The City will undertake the Zoning Ordinance revision immediately following the adoption of this Housing Element.</p> <p>Objectives. Comply with applicable State requirements.</p>  |  |
| <p>4.5.11 Reasonable Accommodation Program</p> <p>This program is a new program that will be implemented during the current planning period. As indicated in Section 2, there are a large number of households in the City that include at least one member that has a disability. Not all of the disability categories require physical alterations to the housing unit to better accommodate the disabled resident. However, many residents would benefit from specific improvements that would better accommodate disabled persons. Under this program, the City will adopt a reasonable accommodation ordinance to provide exception in zoning and land-use regulations for housing for persons with <b>disabilities. Currently, the City's Zoning Ordinance contains no</b> such provisions. The procedures related to the program's implementation will be ministerial in nature with minimal or no processing fee. Improvements may be approved by the Community Development Director as long as a number of findings may be made. First, the request for reasonable accommodation must be used by an individual with a disability protected under fair housing laws. Second, the requested accommodation is necessary to make housing available to an individual with a disability protected under fair housing laws. Third, the requested accommodation would not impose an undue financial or administrative burden on the City. Finally, the requested accommodation would not require a fundamental alteration in the nature of the City's General Plan and Zoning Ordinance.</p> <p>Objectives. Facilitate the development, maintenance and improvement of housing for persons with disabilities; reduce processing time for reasonable accommodation requests by 50%.</p> | <p>The City adopted a Reasonable Accommodation Program (Chapter 21.126 of the Municipal Code) in 2012.</p>   |
| <p>4.5.12 Extremely Low Income Housing Program</p> <p>This program reflects a number existing initiatives that support the provision of housing for households with very-low and low incomes. As indicated in Section 2, there are a number of extremely low income households that require affordable housing. Under this program, the City will prioritize affordable housing funds towards the provision of housing for extremely low income households. A primary objective of this program is to promote the development of housing units for households earning 30 percent or less of the Median Family Income for Los Angeles County. Specific emphasis will be placed on the provision of family housing and non-traditional housing types such as single-room occupancy units and transitional housing (refer to Section 4.5.8). In addition, the Imperial Highway Corridor Specific Plan will permit SRO housing and mixed use development. A second element of this program is the Housing Choice Voucher Program, a federally funded rental program that assists very low-income families, elderly, and disabled households. This program will be an</p>  | <p>The City amended its Zoning Code in 2012 to <b>permit SRO's and mixed use development that</b> provides housing opportunities for extremely low income households.</p> <p>The City participates in the Section 8 Housing Choice Voucher Program through the County of Los Angeles. As of June 2013, 120 vouchers being utilized by La Mirada households and there are 139 La Mirada households on the waiting list.</p> |



**Table 27  
Evaluation of 2006-2014 Housing Element Policy Program**

| Program  | Implementation Status  |
|--|--|
| <p><b>important element in the City's Extremely Low Income Housing Program.</b> Decent, safe, and sanitary housing units are provided to households through rental vouchers. Participants may find their own housing including single-family homes, townhouse, and apartments. Participants are able to select any housing that meets the requirements of the program, and is not limited to units located in subsidized housing projects.</p> <p>Quantified Objectives. Support a minimum of 40 vouchers.</p>   |  |
| <p>4.5.13 Underutilized Sites Program</p> <p>Under this program, La Mirada will proactively encourage the development of underutilized residentially zoned properties within the City. The City will offer regulatory incentives such as relaxed development standards (i.e., building setbacks, height, floor area ratio, parking, etc.), expedited permit processing for projects that contain an affordable housing component, and other incentives. The City will also promote the availability of underutilized sites along with the available incentives through the use of handouts and the City's website. In addition, information concerning the program will be provided at pre-application meetings with developers and during other community outreach meetings. Finally, the City will monitor the supply of underutilized sites and evaluate whether the incentives are effective in promoting the <b>program's implementation. The key elements of this program</b> include the following:</p> <ul style="list-style-type: none"> <li>• The City will continue to provide appropriate land use designations consistent with regional housing needs for mixed use and infill development.</li> <li>• The City will maintain an inventory of potential sites to provide developers with information regarding development incentives for affordable units.</li> <li>• The City will evaluate the feasibility of a sliding density <b>scale that would "award" a developer additional</b> development densities if he/she were able to expand the size of the development site either through outright acquisitions or inviting participation of a neighboring property owner.</li> <li>• The City will identify development opportunities, explore and establish concessions and incentives beyond density bonus law as part of the zoning code update, and allocate financial resources to facilitate lot consolidation.</li> <li>• The City will provide technical assistance and information to private and non-profit housing providers regarding available City and Agency-owned parcels that will be suitable for lower-income development.</li> <li>• The City will facilitate the assembly and recycling of underutilized properties for new affordable housing construction through technical assistance to developers and property owners. Technical assistance includes land development counseling by City planners and a marketing brochure that provides information on available development incentives.</li> </ul> | <p>The City continues to communicate to developers and promote incentives to encourage the availability of underutilized sites on a case by case basis. At this time, the City continues to receive several inquiries from residential developers regarding vacant land.</p> |



**Table 27  
Evaluation of 2006-2014 Housing Element Policy Program**

| Program  | Implementation Status   |
|--|---|
| <p>Objectives. The outreach materials will be completed within 12-months of the Housing Element's adoption.</p>  |   |
| <p>4.5.14 Housing Infill Sites Monitoring Program</p> <p>To ensure adequate sites are available throughout the planning period to meet the City's RHNA, the City will continue to annually update an inventory that details the amount, type, and size of vacant and underutilized parcels to assist developers in identifying land suitable for residential development and that also details the number of extremely low, very low, low, and moderate-income units constructed annually. If the inventory indicates a shortage of available sites, the City shall rezone sufficient sites to accommodate the City's RHNA.</p> <p>To ensure sufficient residential capacity is maintained to accommodate the RHNA need, the City will develop and implement a formal ongoing (project-by-project) evaluation procedure pursuant to Government Code Section 56863. Should an approval of development result in a reduction of capacity below the residential capacity needed to accommodate the remaining need for lower-income households, the City will identify and zone sufficient sites to accommodate the shortfall.</p> <p>Objectives. An annual report will be prepared that indicates progress.</p> | <p>The City adopted the Special Housing Overlay (SHO) district to provide additional opportunities for new housing in specific areas of the city where infill development may be accommodated. The Infill Areas 1 through 9 identified in the Housing Element are included in the SHO district. In addition, the City continues to assist developers in identifying potential residential development opportunities.</p>  |
| <p>4.5.15 Equal Housing Program</p> <p>The City of La Mirada works with the Fair Housing Foundation (with offices in both Los Angeles and Long Beach) to resolve disputes concerning housing discrimination and to educate residents and property owner regarding laws relating to equal housing opportunities. The City will continue to make referrals to the Fair Housing Foundation for housing discrimination. <b>Currently, the City maintains referral information on the City's website and brochures at the Civic Center.</b></p> <p>Quantified Objectives. 100% referrals</p>  | <p>The City continues to contract with the Fair Housing Foundation for fair housing services. The City continues to refer housing discrimination complaints to the Fair Housing Foundation and maintains information on the <b>City's website and at the Civic Center.</b></p>  |
| <p>4.5.16 Resource Conservation Program</p> <p>There are a number of implementing programs that, in addition to providing for new opportunities for housing, also have the added benefit of promoting resource conservation. For example, the areas that have been identified for new infill residential development are located near arterial roadways that are currently serviced by public infrastructure. In addition, the sites are served by public transit that will further reduce the vehicle miles traveled by prospective residents. In addition, these infill areas have been designated for higher residential densities of up to 30 units per acre. An important element of any energy conservation measure will be to identify strategies for retrofitting energy conserving devices in both new residential development and in the rehabilitation of existing development. The City of La Mirada will undertake a Resource Conservation Ordinance that will include the following elements:</p> <ul style="list-style-type: none"> <li>The City will implement a water conservation ordinance that would regulate the time and duration of irrigation.</li> </ul>                            | <p>The City adopted water conservation requirements (Chapter 6.04 of the Municipal Code) on July 14, 2009. The regulations include limiting hours and duration of watering lawns and landscaping, prohibiting excess hose watering, and specific requirements regarding indoor plumbing fixtures, washing vehicles, public eating places and decorative fountains.</p> <p>The City continues to promote water-efficient landscaping through requirements of drought tolerant plant material and appropriate use and application of turf and decorative water features.</p> <p>The City continues to support and encourage the use of solar energy systems. With the passage of Senate Bill No. 1222, the City in partnership with Los Angeles County has streamlined the permit process and</p> |



**Table 27  
Evaluation of 2006-2014 Housing Element Policy Program**

| Program  | Implementation Status  |
|--|--|
| <p>Landscaping installed as part of a new multiple-family development must incorporate sprinklers and timers into the design of the irrigation system. Sprinkler systems (with timers) must be installed in existing multiple-family developments. The irrigation systems must also include rain sensing devices to shut irrigation off during rainy periods and soil sensing devices to measure the amount of moisture in the soil.</p> <ul style="list-style-type: none"> <li>• State law requires that older bathroom toilet fixtures that consume more water be phased out and replaced with toilets that use only 1.6 gallons per flush. As part of the counter review of housing unit rehabilitation, staff will review development plans to ensure compliance with these requirements.</li> <li>• La Mirada will continue to implement the landscape design ordinance that encourages the use of plant materials that consist of drought tolerant plants thus further reducing water consumption in landscaping.</li> <li>• The City shall support the installation of photovoltaic/solar and solar water heating systems on new residential construction as a means to promote a reduction in energy consumption.</li> <li>• <b>The City's website will be expanded to include a discussion of energy conservation measures and devices that, in addition to saving energy, will also save the homeowner or renter money.</b></li> </ul> <p>Quantified Objectives. 100 referrals</p> | <p>implemented the required permit fees to achieve timely and cost-effective installation of photovoltaic/solar systems.</p> |





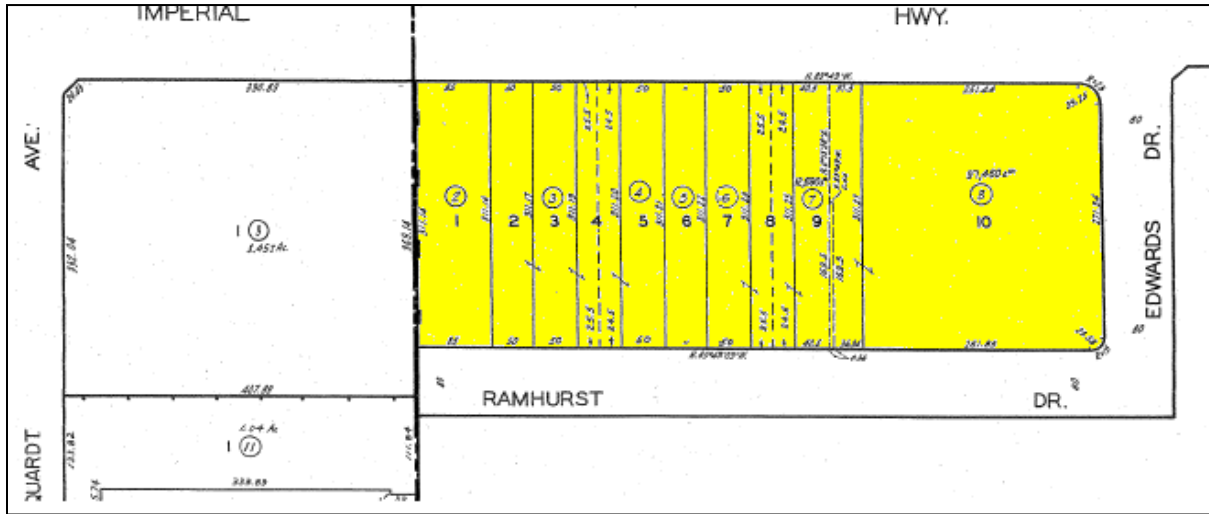


# APPENDIX A

## DESCRIPTION OF AVAILABLE SITES





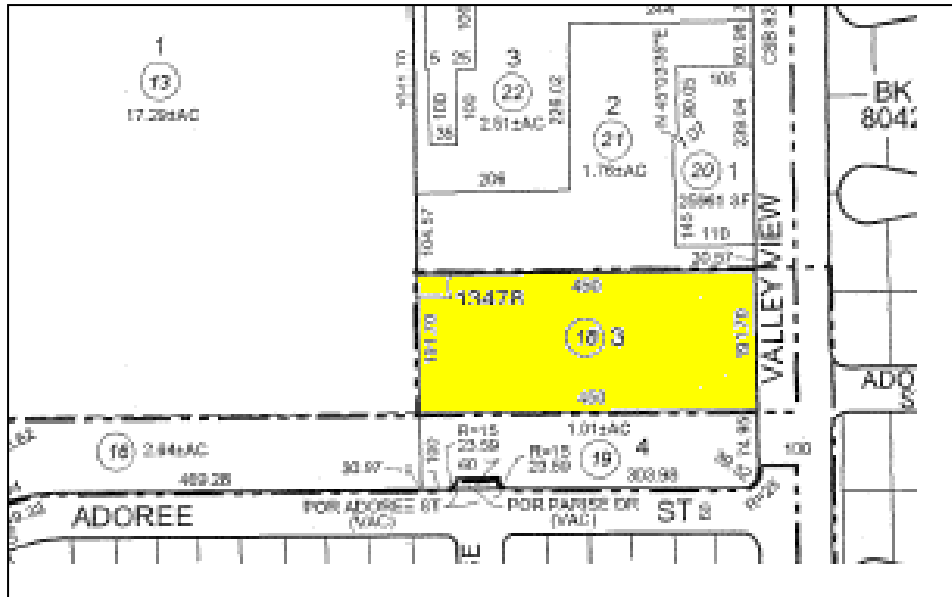


| Parcel No. | Land Area (sq. ft.) | Zoning Designation | General Plan Designation | Existing Land Use  | Maximum Density | Potential Development |
|------------|---------------------|--------------------|--------------------------|--|-----------------|-----------------------|
| 2          | 26,435              | IHSP/SHO           | IHSP                     | Restaurant pad (Jim's Burgers) & bar (Sportsman Cocktails) | 45 units/acre   |                       |
| 3          | 38,875              | IHSP/SHO           | IHSP                     | specialty retail   | 45 units/acre   |                       |
| 4          | 23,325              | IHSP/SHO           | IHSP                     | specialty retail   | 45 units/acre   |                       |
| 5          | 15,550              | IHSP/SHO           | IHSP                     | specialty retail   | 45 units/acre   |                       |
| 6          | 23,325              | IHSP/SHO           | IHSP                     | furniture store 7 liquor store                             | 45 units/acre   |                       |
| 7          | 20,215              | IHSP/SHO           | IHSP                     | Uno Supermarket is closed                                  | 45 units/acre   |                       |
| 8          | 97,460              | IHSP/SHO           | IHSP                     | Big Lots Store and KFC fast food on pad.                   | 45 units/acre   |                       |
| Total      | 245,185             |                    |                          |  |                 |                       |

**Area #1** is located at the westernmost portion of the Imperial Highway corridor that extends through the City. Area #1 is currently occupied by a shopping center that has experienced a number of tenant vacancies (including the former Uno Market) due to the current recession. The anchor tenant is a Big Lots located in the easternmost portion of the center. Two outlying pads are occupied by fast-food restaurants. The parcels that comprise Area #1 are under single ownership and the additional permitted uses will likely encourage redevelopment of the center. Surface parking occupies approximately 50% of the center (both in front and behind the structures). The estimated floor area ratio is around 40%. Under the Imperial Highway Specific Plan, this area may be developed in high density residential multiple-family development or mixed use development at a density of 45 units per acre. Sufficient infrastructure (water and sewer) is located in Imperial Highway to accommodate the proposed use.

**EXHIBIT A-1 HOUSING INFILL AREA - #1**  
**SOURCE: BLODGETT/BAYLOSIS ASSOCIATES**

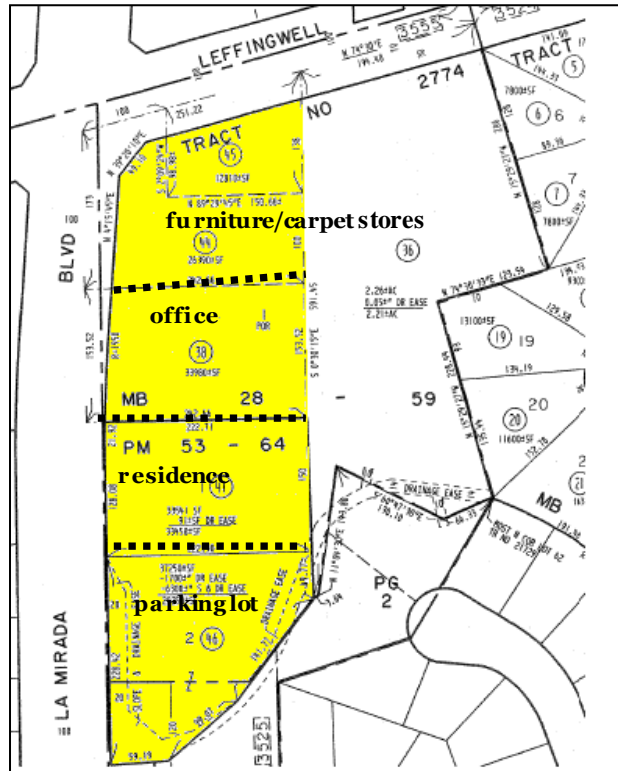
Attachment: City of La Mirada 2013-2021 Housing Element (Appeal of the Draft RHNA Allocation for the City of La Mirada)



| Parcel No. | Land Area (sq. ft.) | Zoning Designation | General Plan Designation | Existing Land Use                | Maximum Density | Potential Development |
|------------|---------------------|--------------------|--------------------------|----------------------------------|-----------------|-----------------------|
| 18         | 86,400              | IHSP/SHO           | IHSP                     | former lumber yard is now vacant | 45 units/acre   |                       |
| Total      | 245,185             |                    |                          |                                  |                 | 89 units              |

**Area #2** is located at the westernmost portion of the Imperial Highway corridor that extends through the City. This area is currently occupied by a vacant business that was formerly a lumber yard. The lumber yard business has been closed for at least 7 years. Area 2 consists of a single parcel and is under single ownership. The parcel that comprises Area #2 is under single ownership and the additional permitted (residential) uses will likely encourage redevelopment of the property. The expanded permitted use may finally encourage the site's redevelopment. Under the Specific Plan, Area #2 may be developed as high density senior housing at a density of 45-units per acre. The development will consist of 89 units. Sufficient infrastructure (water and sewer) is located in Imperial Highway to accommodate the proposed use.

**EXHIBIT A-2 HOUSING INFILL AREA - #2**  
 SOURCE: BLODGETT/BAYLOSIS ASSOCIATES

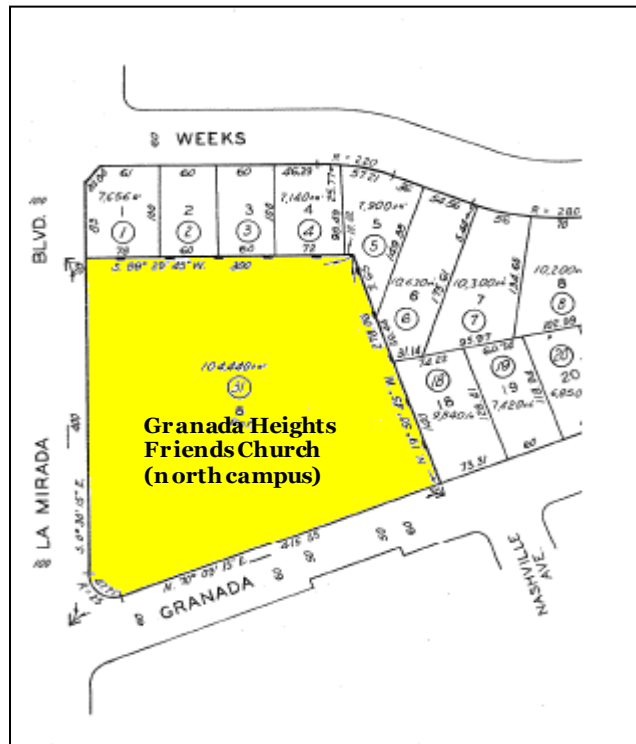


| Parcel No. | Land Area (sq. ft.) | Zoning Designation | General Plan Designation | Existing Land Use                              | Maximum Density | Potential Development |
|------------|---------------------|--------------------|--------------------------|--|-----------------|-----------------------|
| 45         | 12,810              | C-1/SHO/MUO        | Commercial               | furniture and carpet sales (three businesses)  | 40 units/acre   |                       |
| 44         | 26,390              | C-1/SHO/MUO        | Commercial               |  | 40 units/acre   |                       |
| 38         | 33,980              | C-1/SHO/MUO        | Residential              | two level office (Central Professional Center) | 40 units/acre   |                       |
| 41         | 33,450              | R-1/SHO/MUO        | Residential              | single-family home                             | 40 units/acre   |                       |
| 46         | 29,250              | C-1/SHO/MUO        | Residential              | surface parking lot                            | 40 units/acre   |                       |
| Total      | 135,880             |                    |                          |  |                 | 132 units             |

**Area #3** is located at the northernmost end of La Mirada Boulevard. This area is currently occupied by a small neighborhood commercial center that contains 3 businesses engaged in the sales of home furnishings and carpets. These parcels have a relatively low FAR will approximately 60% of the site consisting of surface parking. Further south is a two level office medical building that contains a number of vacant tenant spaces. In addition, this building is now for sale. Approximately 50% of the site consists of surface parking (both front and rear). Parcel 36 consists of a single-family residence. Parcel 46 contains a surface parking lot which is not in use at the present time. The current zoning for Area #3 is C-1 and R-1. Area #3 may be developed in high density residential multiple-family development or mixed use development at a density of 40 units per acre. The development will consist of a 132 units. Sufficient infrastructure (water and sewer) is located in La Mirada Boulevard to accommodate the proposed use.

## EXHIBIT A-3 HOUSING INFILL AREA - #3

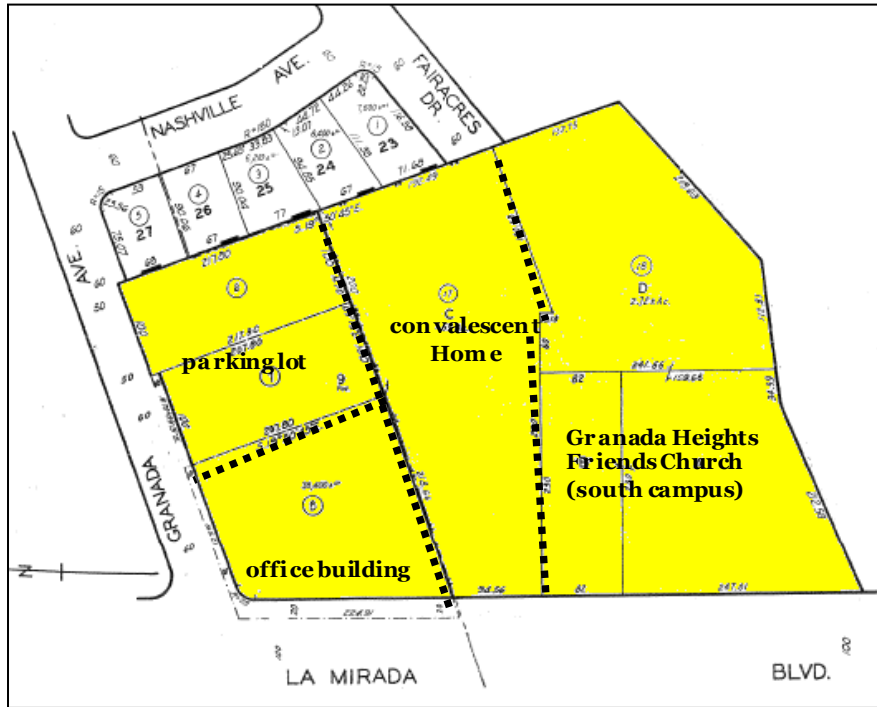
SOURCE: BLODGETT/BAYLOSIS ASSOCIATES



| Parcel No. | Land Area (sq. ft.) | Zoning Designation | General Plan Designation | Existing Land Use                       | Maximum Density | Potential Development |
|------------|---------------------|--------------------|--------------------------|---|-----------------|-----------------------|
| 31         | 104,440             | R-1/SHO/MUO        | Residential              | church (Granada Heights Friends Church) | 40 units/acre   |                       |
| Total      | 104,440             |                    |                          |   |                 | 96 units              |

**Area #4** is also located on the east side of La Mirada Boulevard. This area is currently occupied by a church. The parcel that comprises Area #4 is under single ownership. Other properties owned by the church (refer to Area #3) do not appear to be in use at the present time. The side and rear portions of the site are occupied by surface parking and the overall lot coverage of the existing development is approximately 60%. The site is currently zoned for residential development which will be rezoned to permit greater densities. The area's current zoning is R-1 which will be changed to accommodate either mixed use or high density residential. Area #4 may be developed in high density residential multiple-family development or mixed use development at a density of 40 units per acre. The development will consist of 96 units. Sufficient infrastructure (water and sewer) is located in La Mirada Boulevard to accommodate the proposed use.

**EXHIBIT A-4 HOUSING INFILL AREA - #4**  
**SOURCE: BLODGETT/BAYLOSIS ASSOCIATES**

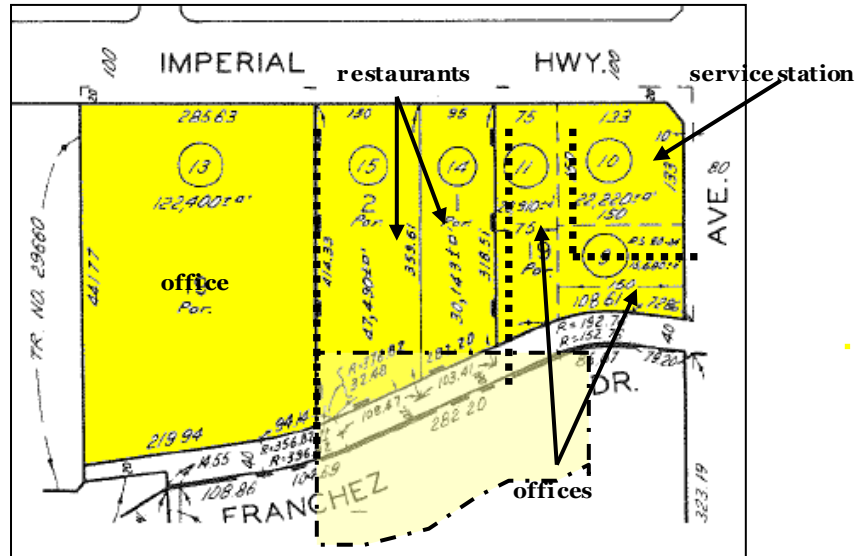


| Parcel No. | Land Area (sq. ft.) | Zoning Designation | General Plan Designation | Existing Land Use                       | Maximum Density | Potential Development |
|------------|---------------------|--------------------|--------------------------|---|-----------------|-----------------------|
| 6          | 21,700              | R-1/SHO/MUO        | Residential              | offices (mostly single level)           | 40 units/acre   |                       |
| 7          | 20,700              | R-1/SHO/MUO        | Residential              | surface parking lot                     | 40 units/acre   |                       |
| 8          | 38,400              | R-1/SHO/MUO        | Residential              | surface parking lot                     | 40 units/acre   |                       |
| 17         | 69,260              | R-1/SHO/MUO        | Residential              | convalescent hospital                   | 40 units/acre   |                       |
| 18         | 118,483             | R-1/SHO/MUO        | Residential              | church (Granada Heights Friends Church) | 40 units/acre   |                       |
| Total      |                     |                    |                          |   |                 | 248 units             |

**Area #5** is also located on the east side of La Mirada Boulevard. This area is currently occupied by a single use, a church and private school. Parcel 6 is occupied by an office that is exhibiting tenant vacancies. Parcels 7 and 8, located to the rear of the office, is a surface parking lot which is not in use during the weekday periods. Parcel 17 is occupied by a 99-bed convalescent hospital (Imperial Convalescent Hospital). The facility was recently acquired by Life Care Centers of America. Parcel 18 is occupied by the “South Campus” of the Granada Heights Friends Church. The majority of the site is occupied by landscaped lawn areas and surface parking. The estimated lot coverage of the existing buildings (which appear to have been constructed in the 1950s and 1960s) is around 35%. The Zoning for Area #5 is R-1 which will be changed to accommodate the proposed uses which will be either mixed use or high density residential. Under the proposed plan, Area #5 may be developed in high density residential multiple-family development or mixed use development at a density of 40 units per acre. The development will consist of a minimum of 247 units. Sufficient infrastructure (water and sewer) is located in La Mirada Boulevard to accommodate the proposed use.

## EXHIBIT A-5 HOUSING INFILL AREA - #5

SOURCE: BLODGETT/BAYLOSIS ASSOCIATES



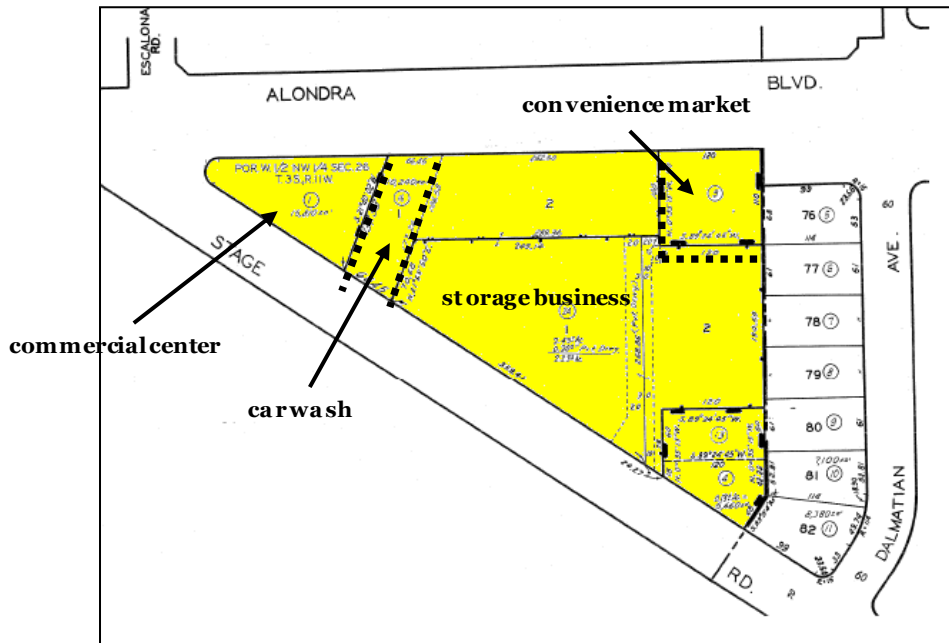
| Parcel No. | Land Area (sq. ft.) | Zoning Designation | General Plan Designation | Existing Land Use                                | Maximum Density | Potential Development |
|------------|---------------------|--------------------|--------------------------|--|-----------------|-----------------------|
| 13         | 122,400             | IHSP               | IHSP                     | office building and vacant property in the rear. | 15 units/acre   |                       |
| 15         | 47,490              | IHSP               | IHSP                     | sit-down restaurant                              | 15 units/acre   |                       |
| 14         | 30,143              | IHSP               | IHSP                     | fast food restaurant                             | 15 units/acre   |                       |
| 11         | 20,910              | IHSP               | IHSP                     | office (single-level)                            | 15 units/acre   |                       |
| 10         | 22,220              | IHSP               | IHSP                     | auto service station                             | 15 units/acre   |                       |
| 9          | 15,690              | IHSP               | IHSP                     | office (single level)                            | 15 units/acre   |                       |
| Total      | 258,853             |                    |                          |  |                 | 89 units              |

**Area #6** is also located on the south side of Imperial Highway within the boundaries of the Imperial Corridor Specific Plan. Parcel 13 is occupied by a two level office building along the Imperial Boulevard frontage. The rear of the parcel is vacant and the office building currently has a high vacancy rate. Parcel 15 is occupied by a sit down restaurant next to Imperial with vacant land and parking areas located to the rear. Parcel 14 is similar though it is occupied by a fast-food restaurant. Both parcels 14 and 15 have a very low FAR with the majority of the site consisting of surface parking or vacant undeveloped property. Parcel 11 is occupied by a single-level office located next to Imperial with a drive aisle extending along the building's west side, connecting with a surface parking area located to the rear of the building. The building is also exhibiting a high rate of vacancies. Parcel 10 is occupied by a Mobile service station. Parcel 9 is occupied by a single level office building located along the Santa Gertrudes Avenue frontage with parking provided in the rear. The parcels that comprise Area 6 collectively have a relatively low floor area ratio overall with vacant undeveloped land and surface parking located to the rear of the buildings. In addition, the site characteristics of the offices also discourage ease of access and circulation. Under the Specific Plan, this area may be developed in residential multiple-family development or mixed use development at a density of 15 units per acre. The development will consist of 89 units. Sufficient infrastructure (water and sewer) is located in Imperial Highway to accommodate the proposed use.

## EXHIBIT A-6 HOUSING INFILL AREA - #6

SOURCE: BLODGETT/BAYLOSIS ASSOCIATES



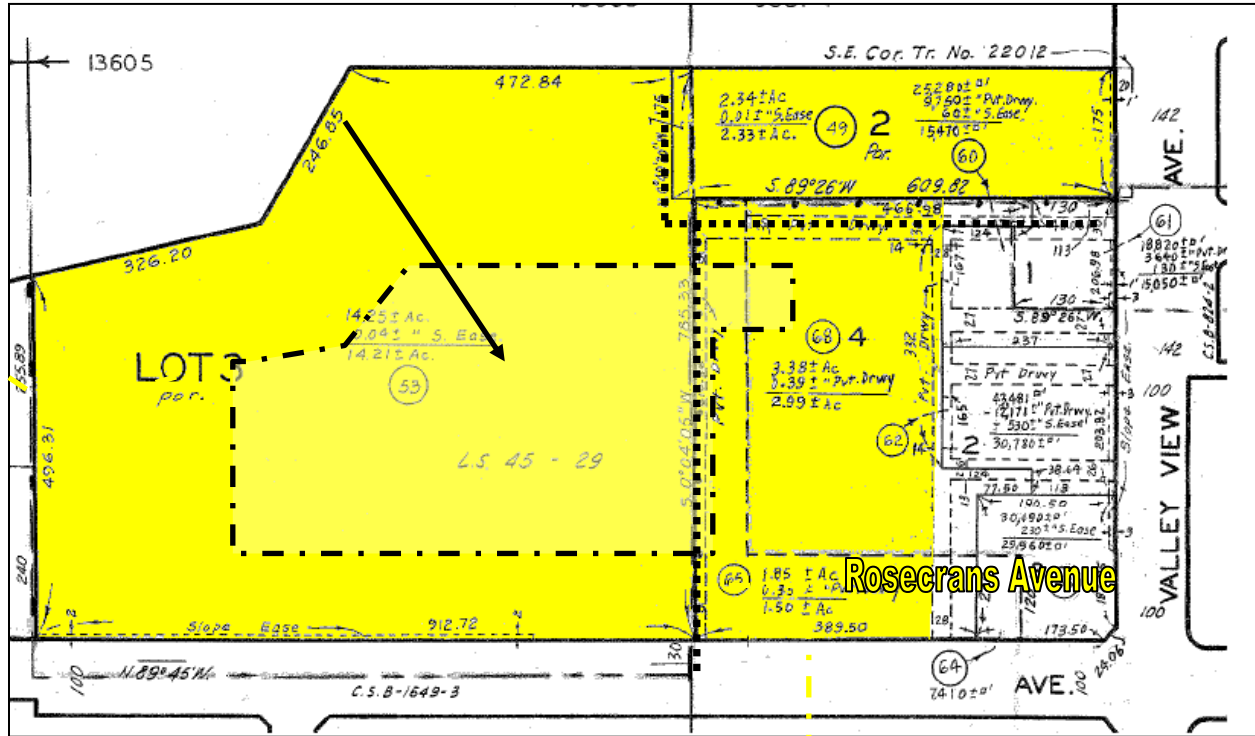


| Parcel No. | Land Area (sq. ft.) | Zoning Designation | General Plan Designation | Existing Land Use  | Maximum Density | Potential Development |
|------------|---------------------|--------------------|--------------------------|--|-----------------|-----------------------|
| 1          | 15,810              | C-4/SHO/MUO        | Commercial               | commercial center (restaurant, home improvement, and market) | 30 units/acre   |                       |
| 16         | 10,240              | C-4/SHO/MUO        | Commercial               | Car Wash and Public Storage                                  | 30 units/acre   |                       |
| 24         | 97,138              | PUD/SHO/MUO        | Commercial               |  | 30 units/acre   |                       |
| 3          | 13,200              | C-4/SHO/MUO        | Commercial               | convenience market   | 30 units/acre   |                       |
| 13         | 7,200               | C-4/SHO/MUO        | Commercial               | Util. Co. storage yard                                       | 30 units/acre   |                       |
| 4          | 5,660               | C-4/SHO/MUO        | Commercial               | Util. Co. storage yard                                       | 30 units/acre   |                       |
| Total      | 149,248             |                    |                          |  |                 | 111 units             |

**Area #7** is also located on the south side of Alondra Boulevard. This area is currently occupied by a neighborhood commercial shopping center near the corner of Alondra and Stage. This center contains three smaller businesses that include a small restaurant, convenience market, and carpet sales). A carwash is located to the rear (on parcel 16) of the commercial business. A small convenience market occupies parcel 3. The remainder of Area #7 is occupied by a single-level mini storage facility operated by Public Storage and Utility Co. storage yard. The existing development within this area (the carwash, public storage, storage yard and small convenience market (Parcels 3, 4, 13, 16, and 24) lend themselves to redevelopment due to the age and intensity of use. These parcels are the most likely to redevelop. A new infill residential development is planned opposite Area #7 on the north side of Alondra. Under the proposed plan, this area may be developed in residential multiple-family development or mixed use development at a density of 30 units per acre. The development will consist of a 111 units. Sufficient infrastructure (water and sewer) is located in Alondra Boulevard to accommodate the proposed use.

### EXHIBIT A-7 HOUSING INFILL AREA - #7

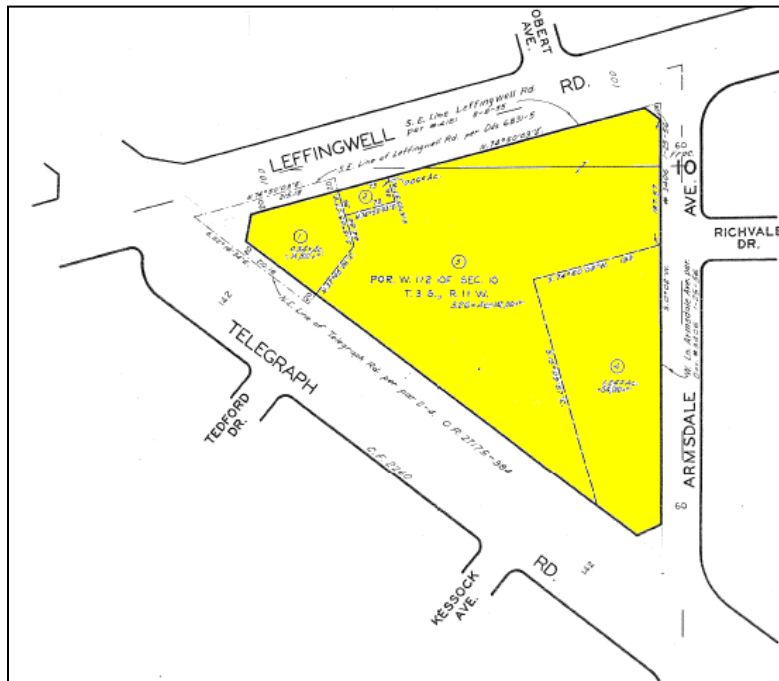
SOURCE: BLODGETT/BAYLOSIS ASSOCIATES



| Parcel No. | Land Area (sq. ft.) | Zoning Designation | General Plan Designation | Existing Land Use          | Maximum Density | Potential Development |
|------------|---------------------|--------------------|--------------------------|----------------------------|-----------------|-----------------------|
| 53         | 618,987             | M-2/SO             | Industrial               | 3 tilt-up warehouse bldgs. | 30 units/acre   |                       |
| 65         | 65,340              | M-2/SO             | Industrial               | 1 tilt-up warehouse bldg.  | 30 units/acre   |                       |
| 68         | 130,244             | M-2/SO             | Industrial               |                            | 30 units/acre   |                       |
| 49         | 101,494             | M-2/SO             | Industrial               | single-family home         | 30 units/acre   |                       |
| Total      | 916,065             |                    |                          |                            |                 | 630 units             |

**Area #8** is also located on the north side of Rosecrans Avenue. Most of Area #8 is occupied by single level tilt-up concrete buildings occupied by industrial and distribution uses. Parcel 49 is occupied by a single residence. During field surveys, high vacancy rates were observed. Field visits conducted during the weekday periods identified few employee vehicles and the majority of the truck high doors were unoccupied. In addition, a majority of the tenant spaces did not have any signage. Under the proposed plan, this area may be developed in multiple-family residential development at a density of 30 units per acre. The development will consist of a 630 units. Sufficient infrastructure (water and sewer) is located in Valley View Avenue to accommodate the proposed use.

**EXHIBIT A-8 HOUSING INFILL AREA - #8**  
**SOURCE: BLODGETT/BAYLOSIS ASSOCIATES**



| Parcel No. | Land Area (sq. ft.) | Zoning Designation | General Plan Designation | Existing Land Use                              | Maximum Density | Potential Development |
|------------|---------------------|--------------------|--------------------------|--|-----------------|-----------------------|
| 1          | 14,810              | C-1/SHO/MUO        | Commercial               | fast food restaurant (Sam's Burgers).          | 30 units/acre   |                       |
| 2          | 2,808               | C-1/SHO/MUO        | Commercial               | neighborhood commercial                        | 30 units/acre   |                       |
| 3          | 142,000             | C-1/SHO/MUO        | Commercial               | center (99Cent Store and a                     | 30 units/acre   |                       |
| 4          | 54,010              | C-1/SHO/MUO        | Commercial               | Goodwill store are the primary anchor tenant). | 30 units/acre   |                       |
| Total      | 213,628             |                    |                          |  |                 | 147 units             |

**Area #9** is located at the juncture of Leffingwell Road and Telegraph Road. This area is currently occupied by a neighborhood commercial center. The major anchor tenants include the 99Cent store and Goodwill Store which together, account for a approximately 50% of the gross leasable floor area. Other tenants include a checkcashing store, a Papa John Pizza, a number of small specialty retail stores, and a dentist. A sit down restaurant is also located in an outlying pad. The majority of the site is occupied by surface parking (both in front and behind the structures). The estimated floor area ratio is around 30%. Under the proposed plan, this area may be developed in residential multiple-family development or mixed used development at a density of 30 units per acre. The development will consist of a 147 units. Sufficient infrastructure (water and sewer) is located in Telegraph Road to accommodate the proposed use.

## EXHIBIT A-9 HOUSING INFILL AREA - #9

SOURCE: BLODGETT/BAYLOSIS ASSOCIATES





# APPENDIX B

## DISTRIBUTION LIST FOR COMMUNITY OUTREACH







Housing Rights Center  
Los Angeles Office  
3255 Wilshire Blvd #1150  
Los Angeles, CA 90010

American Red Cross  
6706 Friends Ave  
Whittier, CA 90601

Bridge of Faith  
P.O. Box 9108  
Whittier, CA 90608

Southern California Association of  
Nonprofit Housing  
501 Shatto Pl, Suite 403  
Los Angeles, CA 90020

American Red Cross  
Greater Long Beach Chapter  
3150 E. 29th Street  
Long Beach, CA. 90806  
Phone: (562) 595-6341

Los Angeles Coalition to End Hunger &  
Homelessness  
2500 Wilshire Boulevard, Suite 1155  
Los Angeles, California 90057  
Telephone: (213) 251-0044  
[www.lacehh.org](http://www.lacehh.org)—(now defunct)

California Housing Partnership Corp.  
600 Wilshire Boulevard, Suite 890  
Los Angeles, CA 90017

Community Advocates for  
People's Choice  
7200 Greenleaf Avenue, #170  
Whittier, CA 906026

Hunger Action Los Angeles  
961 S. Mariposa  
Los Angeles, CA 9000

Coalition for Economic Survival  
514 Shatto Pl #270  
Los Angeles, CA 90020

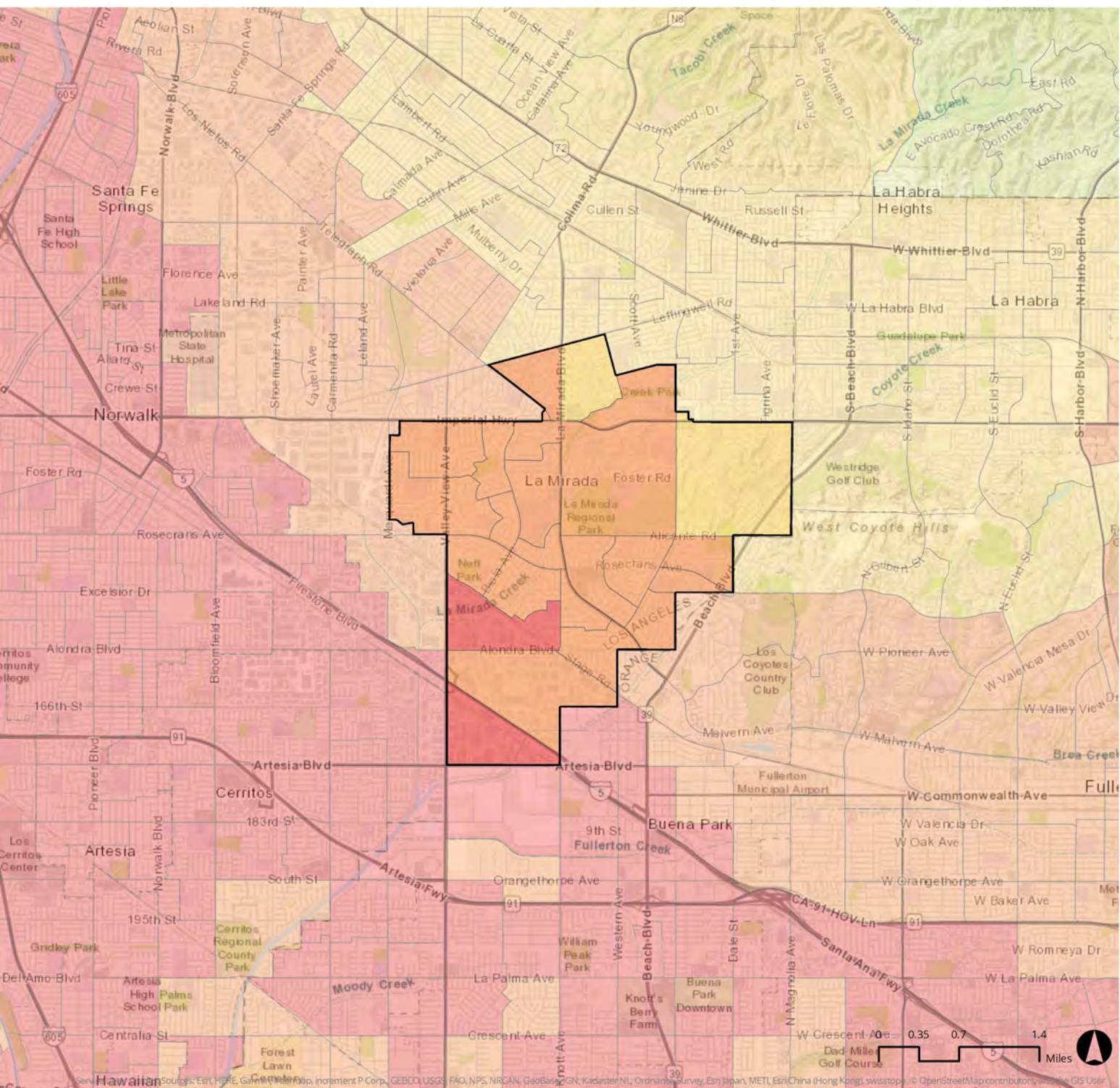
Interfaith Food Center  
11819 Burke Street  
Santa Fe Springs, California 90670

Community Rehabilitation Svcs, Inc.  
4716 Cesar E. Chavez Avenue  
Los Angeles, CA 90022-1210

Housing Corporation of America  
Headquarters  
2022 South 2100 East Ste. 101  
Salt Lake City, Utah 84108

Housing Corporation of America  
Resident Service Dept  
6265 Variel Avenue  
Woodland Hills, CA 91367

Southern California Housing Developer  
Corporation  
9065 Haven Avenue Suite 100  
Rancho Cucamonga, CA 91730



## TAZ-level job accessibility in and around: City of La Mirada [Year 2045]

0% - 2.3%    2.4% - 7.8%    7.9% - 11.7%    11.8% - 15.5%    15.6% - 19.6%    19.7% - 32.3%

Note: These data represent the share of jobs in the SCAG region accessible by automobile commute in 30 minutes in 2045 during the peak AM commute (6-9am). Further detail on the job accessibility measure can be found in SCAG's Final RHNA Methodology. Note that since the SCAG region's total employment forecast for 2045 is 10,049,000 jobs, the number of jobs available can be measured by multiplying the percentage found on the map by this number. For example, a TAZ-level job accessibility measure of 10.0% means that 1,049,000 future jobs could be reached in 30 minutes.

Data Source: SCAG, 2020 | Map Created: 10/22/2020

Disclaimer: The data underlying the information shown on this map reflect jurisdiction's input submitted during the Local Input and Envision Connect SoCal. SCAG shall not be responsible for user's misuse or misrepresentation of this map. For the details regarding the sources, methodology of this map, please refer to the SCAG Data/Map Book at <https://www.connectsocial.org/Pages/Local-Input-Process.aspx> or contact [RTPLocalInfo@scag.ca.gov](mailto:RTPLocalInfo@scag.ca.gov)



**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Ave  
Sacramento, CA 95833-1829  
916) 263-2911 FAX: (916) 263-7453  
www.hcd.ca.gov



December 10, 2020

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

Dear Executive Director Ajise:

**RE: Comment on Appeals of the Draft Regional Housing Need Allocation (RHNA) Plan**

Thank you for the opportunity to comment on the 52 appeals Southern California Association of Governments (SCAG) has received regarding the draft RHNA plan. The appeal process is an important phase in the development of a RHNA plan that ensures that all relevant factors and circumstances are considered.

The only circumstances under which a jurisdiction can appeal are:

- 65584.05(b)(1): The council of governments failed to adequately consider the information regarding the factors listed in subdivision (e) of section 65584.04.
- 65584.05(b)(2): The council of governments failed to determine the share of the regional housing need in a manner that furthers the intent of the objectives listed in subdivision (d) of section 65584.
- 65584.05(b)(3): A significant unforeseen change in circumstances occurred in the local jurisdiction that merits a revision of the information submitted pursuant to subdivision (e) of Section 65584.04.

The California Department of Housing and Community Development (HCD) urges SCAG to only consider appeals that meet these criteria.

Per Government Code section 65584.05(e)(1), SCAG's final determination on whether to accept, reject, or modify any appeal must be accompanied by written findings, including how the final determination is based upon the adopted RHNA allocation methodology, and how any revisions are necessary to further the statutory objectives of RHNA described in Government Code section 65584(d).

Among the appeals based on Government Code section 65584.05(b)(1), several appeals state that SCAG failed to consider the factor described in Government Code section 65584.04(e)(2)(B), citing the lack of land suitable for development as a basis for the appeal. However, this section states the council of governments may not limit its consideration of suitable housing sites to existing zoning and land use restrictions and must consider the potential for increased development under alternative zoning and

land use restrictions. Any comparable data or documentation supporting this appeal should contain an analysis of not only land suitable for urban development, but land for conversion to residential use, the availability of underutilized land, and opportunity for infill development and increased residential densities. In simple terms, this means housing planning cannot be limited to vacant land, and even communities that view themselves as built out must plan for housing through means such as rezoning commercial areas as mixed-use areas and upzoning non-vacant land.

With regard to appeals submitted related to Government Code section 65584.05(b)(2), that SCAG failed to determine the RHNA in a manner that furthers the statutory objectives, it should be noted that HCD reviewed SCAG's draft allocation methodology and found that the draft RHNA allocation methodology furthered the statutory objectives described in Government Code section 65584.

Among the appeals based on Government Code section 65584.05(b)(2), several contend that the cap on units allocated to extremely disadvantaged communities (DACs) does not further RHNA's statutory objectives. This cap furthers the statutory objective to affirmatively further fair housing by allocating more units to high opportunity areas and fewer units to low resource communities, and concentrated areas of poverty with high levels of segregation. Due to the inclusion of this factor, as well as the use of TCAC/HCD Opportunity Maps, SCAG's methodology allocates 14 of the top 15 highest shares of lower-income RHNA to jurisdictions with over 99.95 percent High and Highest Resource areas. With the exceptions of two jurisdictions, the 31 jurisdictions with the highest share of lower-income RHNA are all over 95 percent High and Highest Resource areas. Any weakening of these inputs to the methodology could risk not fulfilling the statutory objective to affirmatively further fair housing.

Several appeals argue that SCAG's RHNA allocation methodology does not adequately promote access to jobs and transit, as required in objectives two and three. HCD's review of SCAG's RHNA methodology found the allocation does further the environmental principles of objective two. SCAG's overall allocation includes significant weight related to the location of high-quality transit areas and the regional distribution of jobs that can be accessed within a 30-minute driving commutes. Regarding objective three, HCD's analysis as to whether jobs-housing fit was furthered by SCAG's draft methodology found that across all jurisdictions there is generally good alignment between low-wage jobs and lower-income RHNA, with all but 15 jurisdictions within a half percent plus or minus difference between their share of lower-income RHNA for the region and their percentage low-wage jobs for the region.

Several appeals are based upon the provision described in Government Code section 65584.05(b)(3), arguing that the COVID-19 pandemic represents a significant and unforeseen change in circumstances that will affect future population and job growth. Ensuring everyone has a home is critical to public health. Reducing and preventing overcrowding and homelessness are essential concerns for every community. The COVID-19 pandemic has only increased the importance that each community is planning for sufficient affordable housing.

Lastly, several appeals state that the Regional Housing Needs Determination (RHND) HCD provided to the SCAG region is too large. SCAG submitted an objection to the RHND at the appropriate time and through the appropriate process. HCD considered those objections and [determined the final RHND for 6<sup>th</sup> Housing Element Cycle for the SCAG region on October 15, 2019](#). There are no further appeal procedures available to alter the SCAG region's RHND for this cycle. Government Code section 65584.05(b) does not allow local governments to appeal the RHND during the 45-day period following receipt of the draft allocation.

HCD acknowledges that many local governments will need to plan for more housing than in the prior cycle to accommodate a RHND that more fully captures the housing need and as the statutory objectives of RHNA shift more housing planning near jobs, transit, and resources. The Southern California region's housing crisis requires each jurisdiction to plan for the housing needs of their community and the region. In recognition of this effort there are more resources available than ever before to support jurisdictions as they prepare to update their 6<sup>th</sup> cycle housing elements:

- SB 2 Planning Grants – \$123 million one-time allocation to cities and counties
- SB 2 Planning Grants Technical Assistance offered to all jurisdictions
- Regional and Local Early Action Planning Grants – \$238 million one-time allocation for local and regional governments
- SB 2 Permanent Local Housing Allocation – approximately \$175 million annually in ongoing funding for local governments to increase affordable housing stock

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Megan Kirkeby, Deputy Director, [megan.kirkeby@hcd.ca.gov](mailto:megan.kirkeby@hcd.ca.gov).



Megan Kirkeby  
Deputy Director



# City of Whittier

13230 Penn Street, Whittier, California 90602-1716  
(562) 567-9320 Fax (562) 567-2872 www.cityofwhittier.org

Electronically Transmitted to: [Housing@scag.ca.gov](mailto:Housing@scag.ca.gov)

December 10, 2020

RHNA Appeals Committee  
Southern California Association of Governments  
900 Wilshire Blvd, Suite 1700  
Los Angeles, CA 90017

**SUBJECT: City of Whittier's Comments on Appeals to the Sixth Cycle Regional Housing Needs Assessment (RHNA) Allocation**

Honorable Chair and Honorable Committee Members:

The City of Whittier ("City") appreciates the challenges that are inherent in allocating 1,341,827 housing units by the thousands (a 226% increase above the baseline 412,137 unit) to cities across Southern California, especially in built-out cities. However, the City is deeply concerned its housing allocation of 3,431 units from the State Department of Housing and Community Development ("HCD") and the Southern California Association of Government's ("SCAG") unit distribution methodology, along with recent housing legislation will fundamentally abridge the City's ability to develop effective land-use policies that are appropriate for managing the community's actual needs. The 878 units in the 5<sup>th</sup> cycle RHNA allocation has been increased by 290% to 3,431 units in the current 6<sup>th</sup> cycle. Particularly challenging in the 6<sup>th</sup> cycle, is the number of low and very low-income units (1,558) which combined with the moderate and above moderate unit totals forces unplanned and unnecessary residential densification of the community.

The affordable units are an unfunded mandate with very limited regional or State financial support for their development. Considering the affordable housing subsidies typically range from \$50,000 to \$250,000 per unit, the overall funding requirements could range from \$78,000,000 to \$390,000,000 which is clearly beyond the reach of the City of Whittier in that the City's general fund budget is just \$72,000,000 which already include \$2,000,000 annually to house the City's unsheltered residents in transitional housing. Additionally, the City only receives 7.5% of each property tax dollar to provide general services including police and library services.

The City is currently in the process of updating its Housing Element as well as the General Plan to incorporate the current RHNA allocation, so Whittier is acutely aware of the various housing needs as well as the potential obstacles, such as aging infrastructure and unplanned density, to creating the requisite housing within a city that

is essentially built out. The changes in the State's housing laws (SB 35, SB 166 and AB 1397) have created additional constraints for the agencies and may severely impact the City's ability to accomplish our regional and local housing goals.

Since development in Whittier began more than 130 years ago, the City is virtually built-out with little developable vacant land outside of its designated open space areas that are dedicated to accommodating existing and future residents. While the City has made significant efforts through its specific plans to densify existing corridors and districts, the majority of Whittier's remaining single-family residential neighborhoods cannot accommodate similar densification. Furthermore, the hills north of Whittier contain regional open space, sensitive habitat and wildlife areas that must be preserved in perpetuity. There are also significant infrastructure and water service constraints that impact Whittier's ability to produce significantly more housing. Although these facts may not be desirable, they must be pragmatically accounted for and mitigated by not further increasing Whittier's share of housing units contained in SCAG's 6<sup>th</sup> Cycle RHNA. The final RHNA allocation and methodology must be fair and equitable while reflecting the capacity for reasonable housing unit construction.

As with many other cities, the City is concerned about the current allocation, but an even greater concern is that additional units may be applied to the City if reallocated from cities that are successful in their appeals. To that end, the City believes the appeal process itself was unclear as to the potential ramifications to other cities and not fully understood.

Although we fully support the surrounding cities in their appeals, the potential for additional units being applied to the City would exacerbate the problems described herein and in Whittier's September 13, 2019 letter to SCAG.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Jeffery S. Adams  
Director of Community Development

File

**From:** Christopher Koontz <Christopher.Koontz@longbeach.gov>  
**Sent:** Thursday, December 3, 2020 11:14 AM  
**To:** Regional Housing  
**Subject:** RHNA Appeals

**Categories:** Response Required, Record

Good morning,

The purpose of this email is to provide the City of Long Beach’s position in regards to pending RHNA appeals before SCAG. The City of Long Beach seeks to meet its housing needs and obligations for the benefit of Long Beach residents and the region. Our allocation was extremely large and presents a planning and financing challenge for the City. Nonetheless we chose not to appeal our allocation because the allocation process was fair and transparent including taking the City of Long Beach’s input into consideration.

We oppose and will not accept any transfer of additional allocation due to the pending appeals. We note that within our area, the Gateway COG, appeals are pending from Bellflower, Cerritos, Downey, Huntington Park, La Mirada, Lakewood, Pico Rivera, and South Gate. Each of these appeals should be evaluated by SCAG on the merits, however Long Beach opposes any transfer of allocation to our City. It would be inappropriate to transfer a further burden to Long Beach when we have already accepted a large allocation and have done more than many cities in the region to accommodate housing growth under the current RHNA cycle, including fully meeting our market-rate RHNA allocation.

The City of Long Beach will continue to work with SCAG and our neighbor jurisdictions to address the housing needs of our residents.

We thank you for consideration and please do not hesitate to contact the City regarding our position.

Christopher Koontz, AICP  
*Deputy Director*

Development Services  
411 W. Ocean Blvd., 3rd Floor | Long Beach, CA 90802  
Office: 562.570.6288 | Fax: 562.570.6068





Southern California Association of Governments  
Remote Participation Only  
January 8, 2021

**To:** Regional Housing Needs Assessment Subcommittee (RHNA)

**EXECUTIVE DIRECTOR'S  
APPROVAL**

**From:** Karen Calderon, Associate Regional Planner,  
(213) 236-1983, calderon@scag.ca.gov

**Subject:** Appeal of the Draft RHNA Allocation for the City of Huntington  
Park

**RECOMMENDED ACTION:**

Deny the appeal filed by the City of Huntington Park (City) to reduce the Draft RHNA Allocation for the City by 1,000 units.

**STRATEGIC PLAN:**

This item supports the following Strategic Plan Goal 2: Advance Southern California's policy interests and planning priorities through regional, statewide, and national engagement and advocacy.

**SUMMARY OF APPEAL:**

The City of Huntington Park requests a reduction of its RHNA allocation by 1,000 units (from 1,601 units to 601 units) based on the following issues:

1. Availability of land suitable for urban development or for conversion to residential use - the City is already fully developed with limited land use, ranking 17th in the nation for highest density.
2. High housing cost burdens - increasing land value is affecting the City's affordability.
3. The rate of overcrowding - high density and overcrowding already results in insufficient parking and open space for its residents.
4. Sewer or water infrastructure constraints for additional development\* - aging infrastructure is a constraint.

\*While the City did not include this factor in the Appeal Request Form, the City indirectly raises the issue.

**RATIONALE FOR STAFF RECOMMENDATION:**

Staff have reviewed the appeal and recommend no change to the City of Huntington Park's RHNA allocation. Issue 1 was not demonstrated to be an impediment to meeting Huntington Park's RHNA

**OUR MISSION**

*To foster innovative regional solutions that improve the lives of Southern Californians through inclusive collaboration, visionary planning, regional advocacy, information sharing, and promoting best practices.*

**OUR VISION**

*Southern California's Catalyst for a Brighter Future*

**OUR CORE VALUES**

*Be Open | Lead by Example | Make an Impact | Be Courageous*

allocation since it does not consider the possibility of alternate zoning and additional opportunities such as accessory dwelling units. SCAG's final RHNA methodology already accounts for the issues raised in Issues 2 and 3. Based on Issue 4, costs to upgrade and develop appropriate infrastructure cannot be considered by SCAG as a justification for a reduction in the RHNA allocation.

## **BACKGROUND:**

### **Draft RHNA Allocation**

Following the adoption of the Final RHNA Methodology on March 5, 2020 and the adoption of Connect SoCal on September 3, 2020, all local jurisdictions received Draft RHNA Allocations on September 11, 2020. A summary is below.

#### **Total RHNA for the City of Huntington Park: 1,601 units**

- Very Low Income: 263 units
- Low Income: 196 units
- Moderate Income: 242 units
- Above Moderate Income: 900 units

Additional background related to the Draft RHNA Allocation is included in Attachment 1.

### **Summary of Comments Received during 45-day Comment Period**

No comments were received from local jurisdictions or HCD during the 45-day public comment period described in Government Code section 65584.05(c) which specifically regard the appeal filed for the City of Huntington Park. Three comments were received which relate to appeals filed generally:

- HCD submitted a comment on December 10, 2020 delineating the statutory basis for RHNA appeals and the requirement that any appeals granted must include written findings regarding how revisions are necessary to further RHNA's statutory objectives.
- The City of Whittier submitted a comment on December 10, 2020 supporting surrounding cities in their appeals but expressing concern that additional units may be applied to Whittier if reallocated from cities which are successful in their appeals.
- The City of Long Beach submitted a comment on December 3, 2020 indicating their view that the RHNA allocation process was fair and transparent, their support for evaluating appeals on their merits (specifically those from the Gateway Council of Governments), and their opposition to any action which would result in a transfer of additional units to Long Beach.



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**ANALYSIS:**

***Issue 1: Availability of land suitable for urban development or for conversion to residential use [Government Code Section 65584.04(e)(2)(B)].***

*The City argues that as a city with only 3 square miles, it has limited land use available and is already fully developed, ranking 17<sup>th</sup> in the nation for highest density.*

**SCAG Staff Response:** Pursuant to Government Code Section 65584.04(e)(2)(B), SCAG “may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality” (which includes the land use policies in its General Plan). “Available land suitable for urban development or conversion to residential use,” as expressed in 65584.04(e)(2)(B), is not restricted to vacant sites; rather, it specifically indicates that underutilized land, opportunities for infill development, and increased residential densities are a component of “available” land. As indicated by HCD in its December 10, 2020 comment letter (HCD Letter):

“In simple terms, this means housing planning cannot be limited to vacant land, and even communities that view themselves as built out must plan for housing through means such as rezoning commercial areas as mixed-use areas and upzoning non-vacant land.” (HCD Letter at p. 2).

As such, the City can consider other opportunities for development. This includes the availability of underutilized land, opportunities for infill development and increased residential densities, or alternative zoning and density. Alternative development opportunities should be explored further and could possibly provide the land needed to zone for the City’s projected growth.

Note that while zoning and capacity analysis is used to meet RHNA need, they should not be used to allocate RHNA need. Per the adopted RHNA methodology, RHNA need at the jurisdictional level is determined by projected household growth, transit access, and job access. Housing need, both existing and projected need, is independent of zoning and other related land use restrictions, and in some cases is exacerbated by these very same restrictions. Thus, land use capacity that is restricted by factors unrelated to existing or projected housing need cannot determine existing or projected housing need.

***Issue 2: High housing cost burdens [Government Code Section 65584.04(e)(6)].***

*The City argues increasing land value is affecting the City’s affordability.*

**SCAG Staff Response:** A RHNA allocation is a representation of a jurisdiction's existing and projected housing need. Cost-burdened households, or those who pay at least 30 percent of their household income on housing costs, is a prevalent problem throughout the region. Cost-burdened households are seen in both high- and low-income communities, suggesting that in most of the SCAG region high housing costs are a consistent problem for all income levels, and is a regional indicator of existing housing need. Meanwhile, a jurisdiction's assigned RHNA allocation is intended to address a share of regional housing need. Though RHNA methodology calculates jurisdictional existing need through the factors of job access and transit access, the regional existing need generated by housing crisis indicators are addressed.

While household cost burden is a regional problem, it is impossible to determine how and why the cost-burden is occurring in a particular jurisdiction. Cost-burden is a symptom of housing need and not its cause. A jurisdiction might permit a high number of units but still experience cost-burden because other jurisdictions restrict residential permitting. Or a jurisdiction might have a large number of owner-occupied housing units that command premium pricing, causing cost-burden for high income households and especially on lower income households due to high rents from high land costs. Because cost-burden is already addressed as a regional existing need and, at a jurisdictional level may not be a cause of existing need, SCAG staff does not recommend a change to the jurisdiction's draft RHNA allocation based on this factor.

**Issue 3:** *The rate of overcrowding [Government Code Section 65584.04(e)(7)].*

*The City argues that high density and overcrowding has resulted in insufficient parking and open space for its residents already. Adding more residential units would exacerbate this problem.*

**SCAG Staff Response:** Government Code Section 65584.04(e)(2)(B) encourages the consideration of available land beyond vacant land, including underutilized land, opportunities for infill development, and increased residential densities. It should be noted that increased density is not a synonym for overcrowding. Overcrowding is defined as more than 1.01 persons per room in a housing unit and a jurisdiction can increase its density without resulting in overcrowded housing units. One of the objectives of increasing housing supply is to reduce overcrowding and ironically, planning for fewer housing units than needed may in fact result in overcrowding.

While SCAG understands it is a challenge for jurisdictions to provide the appropriate infrastructure, parking, open space, and other public services, that does not preclude the jurisdiction from planning and zoning for the existing and projected housing need and cannot be considered as a basis for appeal.

As part of the regional determination, HCD applied an overcrowding component. Similar to cost-burden, overcrowding is caused by an accumulated housing supply deficit and is considered an

indicator of regional existing housing need. Because overcrowding is already addressed as a regional existing need, and infrastructure challenges do not preclude planning and zoning for housing need, SCAG staff does not recommend a change to the jurisdiction's draft RHNA allocation based on this factor.

However, SCAG recognizes many jurisdictions with especially high job and transit accessibility are lower-income and lower-resourced. As described in Attachment 1, the RHNA methodology applies a maximum to disadvantaged communities (DACs) equal to the 2045 household growth forecast. As a DAC, the City of Huntington Park received a reduction of 3,364 units, such that the City's total RHNA housing unit need does not exceed its 2020-2045 forecasted growth of 1,601 households. Please see Attachment 1, "Local Input and Development of Draft RHNA Allocation" which describes the extent of local engagement and review opportunities provided to local jurisdictions on the growth forecast. Review opportunities began in October 2017. While the initial deadline for input was October 2018, additional review opportunities were provided to all local jurisdictions through June 2020.

**Issue 4: Sewer or water infrastructure constraints for additional development [Government Code Section 65584.04(e)(2)(A)]**

*The City points to its aging infrastructure as a constraint.*

**SCAG Staff Response:** For Government Code Section 65584.04(e)(2)(A) to apply in this case, the jurisdiction must be precluded from providing necessary infrastructure for additional development due to supply and distribution decisions made by a sewer or water provider other than the local jurisdiction. For the water constraints mentioned by the jurisdiction, it is not evident that the respective water provider has rendered a decision that would prevent the jurisdiction from providing necessary infrastructure. In addition, costs to upgrade and develop appropriate infrastructure cannot be considered by SCAG as a justification for a reduction since the RHNA Allocation is not a building quota. Rather, a jurisdiction is required to plan and zone for housing need and is not required to develop the assigned units. For these reasons, SCAG staff does not recommend a housing need reduction based upon this planning factor.

**FISCAL IMPACT:**

Work associated with this item is included in the current FY20-21 Overall Work Program (300-4872Y0.02: Regional Housing Needs Assessment).

**ATTACHMENT(S):**

1. Local Input and Development of Draft RHNA Allocation (City of Huntington Park)
2. Appeal Form and Supporting Documentation (City of Huntington Park)
3. Comments Received During the Comment Period (General)

### **Attachment 1: Local Input and Development of Draft RHNA Allocation**

This attachment sets forth the nature and timing of the opportunities which the City of Huntington Park had to provide information and local input on SCAG's growth forecast, the RHNA methodology, and the Growth Vision of the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). It also describes how the RHNA Methodology development process integrates this information in order to develop the City of Huntington Park's Draft RHNA Allocation.

#### **1. Local Input**

##### ***a. Bottom-Up Local Input and Envisioning Process***

On October 31, 2017, SCAG took the first step toward developing draft RHNA allocations by initiating the Bottom-Up Local Input and Envisioning Process. At the direction of the Regional Council, the objective of this process was to seek local input and data to prepare for Connect SoCal and the 6<sup>th</sup> cycle of RHNA.<sup>1</sup> Each jurisdiction was provided with a package of land use, transportation, environmental, and growth forecast data for review and revision which was due on October 1, 2018.<sup>2</sup> While the local input process materials focus principally on jurisdiction-level and Transportation Analysis Zone (TAZ) level growth, input on specific parcels, sites, and project areas were welcomed and integrated into SCAG's growth forecast as well as data on other elements. SCAG met one-on-one with all 197 local jurisdictions between November 2017 and July 2018 and provided training opportunities and staff support. Following input from SCAG's Technical Working Group (TWG), the Connect SoCal growth forecast reflected precisely the jurisdiction-level growth totals provided during this process.

The local input data included SCAG's preliminary growth forecast information. For the City of Huntington Park, the anticipated number of households in 2020 was 14,986 and in 2030 was 15,651 (growth of 665 households). In May 2018, SCAG staff met with local jurisdiction staff to discuss the Bottom-Up Local Input and Envisioning Process and answer questions. Input was not received. The preliminary figures above were used by SCAG.

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<sup>1</sup> While the RTP/SCS and RHNA share data elements, they are distinct processes. The RTP/SCS growth forecast provides an assessment of reasonably foreseeable future patterns of employment, population, and household growth in the region given demographic and economic trends, and existing local and regional policy priorities. The RHNA identifies anticipated housing need over a specified eight-year period and requires that local jurisdictions make available sufficient zoned capacity to accommodate this need. A further discussion of the relationship between these processes can be found in Connect SoCal Master Response 1 at [https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal\\_Public-Participation-Appendix-2.pdf](https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal_Public-Participation-Appendix-2.pdf).

<sup>2</sup> A detailed list of data during this process reviewed can be found in each jurisdiction's Draft Data/Map Book at <http://scagrtpscs.net/Pages/DataMapBooks.aspx>

### **b. RHNA Methodology Surveys**

On March 19, 2019, SCAG distributed a packet of methodology surveys, which included the local planning factor survey (formerly known as the AB2158 factor survey), Affirmatively Furthering Fair Housing (AFFH) survey, and replacement need survey, to SCAG jurisdictions' Community Development Directors. Surveys were due on April 30, 2019. SCAG reviewed all submitted responses as part of the development of the draft RHNA methodology. The City of Huntington Park submitted the following surveys prior to the adoption of the draft RHNA methodology:

- Local planning factor survey
- Affirmatively Furthering Fair Housing (AFFH) survey
- Replacement need survey
- No survey was submitted to SCAG

### **c. Connect SoCal Growth Vision and Additional Refinements**

Beginning in May 2018, SCAG's Sustainable Communities Working Group began the process of developing growth scenarios for the SCAG region. The culmination of this work was the development of the Connect SoCal Growth Vision, which directly uses jurisdictional-level growth projections from the Bottom-Up Local Input and Envisioning process, and also features strategies for growth at the TAZ-level that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Additional detail regarding the Connect SoCal Growth Vision, specifically the Transportation Analysis Zone (TAZ, or neighborhood) level projections is found at <https://scag.ca.gov/sites/main/files/file-attachments/growth-vision-methodology.pdf>

As a result of these strategies, in some jurisdictions growth at the TAZ-level differed from locally anticipated growth conveyed during the Bottom-Up Local Input and Envisioning Process.

As such, SCAG provided two additional opportunities for all local jurisdictions to make TAZ-level technical refinements on the topics of general plan capacities and entitlements. During the release of the draft Connect SoCal Plan, jurisdictions were notified on October 31, 2019 that SCAG would accept additional refinements until December 11, 2019. Following the Regional Council's decision to delay full adoption of Connect SoCal for 120 days due to the COVID-19 pandemic, all jurisdictions were again notified on May 26, 2020 that SCAG would accept additional refinements until June 9, 2020.

Connect SoCal Growth Vision data have been available to local jurisdiction staff during the entirety of this process through SCAG's Scenario Planning Model Data Management Site (SPM-DM) at <http://spmdm.scag.ca.gov> and updates were shared with local jurisdictions on technical refinements to the data in February 2020 and August 2020 to share the results of both review opportunities.

SCAG did not receive additional technical corrections from the City of Huntington Park from which differed from the Growth Vision.

## 2. Development of the Final RHNA Methodology

SCAG convened the first meeting of the RHNA Subcommittee in October 2018. In their subsequent monthly meetings, this body reviewed and advised on the development of SCAG's 6<sup>th</sup> cycle RHNA process, including the development of the RHNA methodology. Per Government Code 65584.04(a), SCAG must develop a RHNA methodology which furthers the five statutory objectives of RHNA:

*(1) Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households.*

*(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.*

*(3) Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.*

*(4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.*

*(5) Affirmatively furthering fair housing (Govt. Code § 65584(d)).*

As explained in more detail below, the Draft RHNA Methodology (which was adopted as the Final RHNA Methodology) set forth the policy factors, data sources, and calculations which would be used to generate draft RHNA allocations for all local jurisdictions. Following extensive debate and public comment, SCAG's Regional Council voted to approve the Draft RHNA Methodology on November 7, 2019 and provide it to HCD for review. Per Government Code 65584.04(i), HCD is vested with the authority to determine whether a methodology furthers the objectives set forth in Government Code section 65584(d). On January 13, 2020, HCD found that the Draft RHNA Methodology furthers these five statutory objectives of RHNA. Specifically, HCD noted that:

*"This methodology generally distributes more RHNA, particularly lower income RHNA, near jobs, transit, and resources linked to long term improvements of life outcomes.*

*In particular, HCD applauds the use of the objective factors specifically linked the statutory objectives in the existing need methodology.” (Letter from HCD to SCAG dated January 13, 2020 at <https://scag.ca.gov/sites/main/files/file-attachments/hcd-review-rc-approved-draft-rhna-methodology.pdf?1602190239>).*

On March 5, 2020, again following extensive debate and public comment, the Regional Council voted to approve the Draft RHNA Methodology as the Final RHNA Methodology. Unlike SCAG’s 5<sup>th</sup> cycle RHNA methodology which relies almost entirely on the household growth component of the RTP/SCS, SCAG’s 6<sup>th</sup> cycle RHNA methodology consists of two primary elements: “projected need” which includes the number of housing units required to accommodate anticipated population growth over the 8-year RHNA planning period and “existing need,” which refers to the number of housing units required to accommodate excess or unsatisfied housing demand experienced by the region’s current population.<sup>3</sup> Furthermore, the Final RHNA methodology utilizes measures of 2045 job accessibility and High Quality Transit Area (HQT) population measures based on TAZ-level projections in the Connect SoCal Growth Vision.

More specifically, the Final RHNA Methodology considers three primary factors in determining a local jurisdiction’s total housing need which are primarily based on data from Connect SoCal’s aforementioned Bottom-Up Local Input and Envisioning Process:

- Forecasted growth over 2020-2030 (projected need)
- Transit accessibility in 2045 (existing need)
- Job accessibility in 2045 (existing need)

The methodology is described in further detail at:  
<http://scag.ca.gov/programs/Documents/RHNA/SCAG-Final-RHNA-Methodology-030520.pdf>.

### 3. Draft RHNA Allocation for the City of Huntington Park

Following the adoption of the Final RHNA Methodology on March 5, 2020 and the 120 day delay due to the COVID-19 pandemic, SCAG adopted Connect SoCal on September 3, 2020, and the City of Huntington Park received its draft RHNA allocation on September 11, 2020. Application of the RHNA methodology yields the draft RHNA allocation for the City of Huntington Park as summarized in the data and calculations in the tables below.

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<sup>3</sup> Legislative changes in 2018 modified the nature of the regional housing need determination for the 6<sup>th</sup> cycle of RHNA by adding measures of household overcrowding and housing cost burden to the list of factors to be considered by HCD for the determination of housing need. These new measures are not included in the Connect SoCal Growth Forecast because they are not direct inputs to the growth forecasting process and are independent of employment and population projections. In contrast, they reflect additional latent housing needs in the current population (i.e. “existing need”) and would not result in a change in regional population. For further discussion see Connect SoCal Master Response 1 at [https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal\\_Public-Participation-Appendix-2.pdf](https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal_Public-Participation-Appendix-2.pdf).

**Huntington Park city statistics and inputs:**

|  |           |
|--|-----------|
| Forecasted household (HH) growth, RHNA period:<br><i>(2020-2030 Household Growth * 0.825)</i>  | 549       |
| Percent of households who are renting:   | 74%       |
| Housing unit loss from demolition (2009-18):   | 137       |
| Adjusted forecasted household growth, 2020-2045:<br><i>(Local input growth forecast total adjusted by the difference between the RHNA determination and SCAG's regional 2020-2045 forecast, +4%)</i> | 1,601     |
| Percent of regional jobs accessible in 30 mins (2045):<br><i>(For the jurisdiction's median TAZ)</i>   | 18.06%    |
| Jobs accessible from the jurisdiction's median TAZ (2045):<br><i>(Based on Connect SoCal's 2045 regional forecast of 10.049M jobs)</i>   | 1,814,000 |
| Share of region's job accessibility (population weighted):   | 0.42%     |
| Jurisdiction's HQT population (2045):  | 60,714    |
| Share of region's HQT population (2045):   | 0.59%     |
| Share of population in low/very low-resource tracts:   | 81.41%    |
| Share of population in very high-resource tracts:  | 0.00%     |
| Social equity adjustment:  | 170%      |



| <b>Calculation of Draft RHNA Allocation for Huntington Park city</b>  |             |
|---|-------------|
| Forecasted household (HH) growth, RHNA period:  | 549         |
| Vacancy Adjustment<br><i>(5% for renter households and 1.5% for owner households)</i>   | 22          |
| Replacement Need  | 137         |
| <b>TOTAL PROJECTED NEED:</b>  | <b>708</b>  |
| Existing need due to job accessibility (50%)  | 1773        |
| Existing need due to HQTAs pop. share (50%)   | 2484        |
| Net residual factor for existing need<br><i>(Negative values reflect a cap on lower-resourced community with good job and/or transit access. Positive values represent this amount being redistributed to higher-resourced communities based on their job and/or transit access.)</i> | -3364       |
| <b>TOTAL EXISTING NEED</b>  | <b>893</b>  |
| <b>TOTAL RHNA FOR HUNTINGTON PARK CITY</b>  | <b>1601</b> |
| Very-low income (<50% of AMI)   | 263         |
| Low income (50-80% of AMI)  | 196         |
| Moderate income (80-120% of AMI)  | 242         |
| Above moderate income (>120% of AMI)  | 900         |

The transit accessibility measure is based on the population anticipated to live in High-Quality Transit Areas (HQTAs) in 2045 based on Connect SoCal’s designation of high-quality transit areas and population forecasts. With a forecasted 2045 population of 60,714 living within HQTAs, the City of Huntington Park represents 0.59% of the SCAG region’s HQTAs population, which is the basis for allocating housing units based on transit accessibility.

Job accessibility is defined as the jurisdiction's share of regional jobs accessible within a 30-minute drive commute. Since over 80 percent of the region's workers live and work in different jurisdictions, the RHNA methodology uses a measure based on Connect SoCal's travel demand model output for the year 2045 rather than assigning housing units based on the number of jobs with a specific jurisdiction. Specifically, the share of future (2045) regional jobs which can be reached in a 30-minute automobile commute from the local jurisdiction's median TAZ is used as to allocate housing units based on transit accessibility. From the City of Huntington Park's median TAZ, it will be possible to reach 18.06% of the region's jobs in 2045 within a 30-minute automobile commute (1,814,000 jobs, based on Connect SoCal's 2045 regional job forecast of 10,049,000 jobs).

While allocating housing need on the basis of job and transit accessibility is consistent with the statutory objectives of RHNA and represents factors in which Huntington Park scores highly, in the SCAG region many jurisdictions with especially high job and transit accessibility are lower-income and lower-resourced. The methodology applies a maximum to these so-called disadvantaged communities (DACs) equal to the 2045 household growth forecast, as described above. While Huntington Park's existing need factors score highly, as a DAC a residual factor of -3,364 is applied such that the City's total RHNA housing unit need of 1,601 units is not in excess of its 2020-2045 forecasted household growth plus approximately 3 percent.

Please note that the above represents only a partial description of key data and calculations in the RHNA methodology.

**Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form**  
*All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.*  
*Appeals and supporting documentation should be submitted to [housing@scaq.ca.gov](mailto:housing@scaq.ca.gov).*  
*Late submissions will not be accepted.*

Date: \_\_\_\_\_ Jurisdiction Subject to This Appeal Filing: \_\_\_\_\_  
 (to file another appeal, please use another form)

Filing Party (Jurisdiction or HCD)  
 \_\_\_\_\_

Filing Party Contact Name  
 \_\_\_\_\_

Filing Party Email:  
 \_\_\_\_\_

**APPEAL AUTHORIZED BY:**

Name: \_\_\_\_\_

**PLEASE SELECT BELOW:**

- Mayor
- Chief Administrative Office
- City Manager
- Chair of County Board of Supervisors
- Planning Director
- Other: \_\_\_\_\_

**BASES FOR APPEAL**

- Application of the adopted Final RHNA Methodology for the 6<sup>th</sup> Cycle RHNA (2021-2029)
- Local Planning Factors and/or Information Related to Affirmatively Furthering Fair Housing (See Government Code Section 65584.04 (b)(2) and (e))
  - Existing or projected jobs-housing balance
  - Sewer or water infrastructure constraints for additional development
  - Availability of land suitable for urban development or for conversion to residential use
  - Lands protected from urban development under existing federal or state programs
  - County policies to preserve prime agricultural land
  - Distribution of household growth assumed for purposes of comparable Regional Transportation Plans
  - County-city agreements to direct growth toward incorporated areas of County
  - Loss of units contained in assisted housing developments
  - High housing cost burdens
  - The rate of overcrowding
  - Housing needs of farmworkers
  - Housing needs generated by the presence of a university campus within a jurisdiction
  - Loss of units during a state of emergency
  - The region's greenhouse gas emissions targets
  - Affirmatively furthering fair housing
- Changed Circumstances (Per Government Code Section 65584.05(b), appeals based on change of circumstance can only be made by the jurisdiction or jurisdictions where the change in circumstance occurred)

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_ Hearing Date: \_\_\_\_\_ Planner: \_\_\_\_\_

**Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form**  
*All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.*  
*Appeals and supporting documentation should be submitted to [housing@scaq.ca.gov](mailto:housing@scaq.ca.gov).*  
*Late submissions will not be accepted.*

**Brief statement on why this revision is necessary to further the intent of the objectives listed in Government Code Section 65584 (please refer to Exhibit C of the Appeals Guidelines):**

**Please include supporting documentation for evidence as needed, and attach additional pages if you need more room.**

**Brief Description of Appeal Request and Desired Outcome:**

**Number of units requested to be reduced or added to the jurisdiction's draft RHNA allocation (circle one):**

Reduced \_\_\_\_\_ Added \_\_\_\_\_

**List of Supporting Documentation, by Title and Number of Pages**  
**(Numbers may be continued to accommodate additional supporting documentation):**

- 1.
- 2.
- 3.

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_

Hearing Date: \_\_\_\_\_

Planner: \_\_\_\_\_

## 6th RHNA Cycle Appeals Procedures

Pursuant to Government Code section 65584.05, any local jurisdiction within the SCAG region may file an appeal to modify its allocated share or another jurisdiction's share of the regional housing need included as part of SCAG's Draft Regional Housing Needs Assessment (RHNA) Allocation Plan, hereinafter referred to as the "Draft RHNA Plan." The California Department of Housing and Community Development, hereinafter referred to as "HCD", may also file an appeal to one or more jurisdiction's draft RHNA allocation. No appeal shall be allowed relating to post-appeal reallocation adjustments made by SCAG, as further described in Section II, below.

### I. APPEALS PROCESS

#### A. DEADLINE TO FILE

The period to file appeals shall commence on September 11, 2020<sup>1</sup>, which shall be deemed as the date of receipt by jurisdictions and HCD of the draft RHNA Plan. In order to comply with Government Code § 65584.05(b), a jurisdiction or HCD seeking to appeal a draft allocation of the regional housing need must file an appeal by 5:00 p.m. October 26, 2020. Late appeals shall not be accepted by SCAG.

#### B. FORM OF APPEAL

The local jurisdiction shall state the basis and specific reasons for its appeal on the RHNA Appeal Request Form prepared by SCAG, a copy of which is attached hereto as Exhibit "A". Additional documents may be submitted by the local jurisdiction as attachments, and all such attachments should be properly labeled and numbered.

#### C. BASES FOR APPEAL

Local jurisdictions shall only file an appeal based upon the criteria listed below. In order to provide guidance to potential appellants, SCAG's Final RHNA Methodology for the 6<sup>th</sup> Housing Element Cycle (2021-2029) (Final RHNA Methodology) approved by SCAG's Regional Council on March 5, 2020, is attached hereto as Exhibit "B". Appeals based on "change of circumstance" can only be filed by the jurisdiction or jurisdictions where the change in circumstance occurred.

Pursuant to Government Code Section 65584.05, filed appeals must include a statement as to why the revision is necessary to further the intent of the objectives listed in Section 65584. Additionally, Government Code Section 65584.05(b) requires that all

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<sup>1</sup> The period to file appeals shall commence on the eighth day after the Regional Council adopts the Final Connect SoCal in its entirety, and all the subsequent dates in this Appeals Procedures shall be adjusted accordingly.

filed appeals must be consistent with, and not to the detriment of, the development pattern in the sustainable communities strategy, or SCAG’s Connect SoCal Plan, pursuant to Government Code Section 65080(b)(2).

1. Methodology – That SCAG failed to determine the jurisdiction’s share of the regional housing need in accordance with the information described in the Final RHNA Methodology established and approved by SCAG, and in a manner that furthers, and does not undermine the five objectives listed in Government Code Section 65584(d).
  
2. Local Planning Factors and Information Affirmatively Furthering Fair Housing (AFFH) – That SCAG failed to consider information submitted by the local jurisdiction relating to certain local factors outlined in Govt. Code § 65584.04(e) and information submitted by the local jurisdiction relating to affirmatively furthering fair housing pursuant to Government Code § 65584.04(b)(2) and 65584(d)(5) including the following:
  - a. Each jurisdiction’s existing and projected jobs and housing relationship.
  - b. The opportunities and constraints to development of additional housing in each jurisdiction, including the following:
    - (1) lack of capacity for sewer or water service due to federal or 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;
    - (2) 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;
    - (3) Lands preserved or protected from urban development under existing federal or state programs, or both, designed to protect open space, farmland, environmental habitats, and natural resources on a long-term basis, including land zoned or designated for agricultural protection or

preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts conversion to non-agricultural uses.

- (4) County policies to preserve prime agricultural land, as defined pursuant to Government Code § 56064, within an unincorporated area, and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts its conversion to non-agricultural uses.
- c. 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.
- d. Agreements between a county and cities in a county to direct growth toward incorporated areas of the county or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of the jurisdiction that prohibits or restricts conversion to nonagricultural uses.
- e. The loss of units contained in assisted housing developments, as defined in Government Code § 65583(a)(9), that changed to non-low-income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions.
- f. The percentage of existing households at each of the income levels listed in subdivision (e) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent.
- g. The rate of overcrowding.
- h. The housing needs of farmworkers.
- i. The 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.
- j. The loss of units during a state of emergency that was declared by the Governor pursuant to the California

Emergency Services Act (Chapter 7(commencing with Section 8550) of Division 1 of Title 2), during the planning period immediately preceding the relevant revision pursuant to Section 65588 that have yet to be rebuilt or replaced at the time of the analysis. For purposes of these guidelines, this applies to loss of units during a state of emergency occurring since October 2013 and have not yet been rebuilt or replaced by the time of the development of the draft RHNA methodology, or November 7, 2019.

- k. The region’s greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080, to be met by SCAG’s Connect SoCal Plan.
  - l. Information based upon the issues, strategies, and actions that are included, as available in an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing completed by any city or county or the California Department of Housing and Community Development, and in housing elements
3. Changed Circumstances – That a significant and unforeseen change in circumstance has occurred in the jurisdiction after April 30, 2019 and merits a revision of the information previously submitted by the local jurisdiction. Appeals on this basis shall only be made by the jurisdiction or jurisdictions where the change in circumstances has occurred.

**D. LIMITS ON SCOPE OF APPEAL**

Existing law explicitly limits SCAG’s scope of review of appeals. Specifically, SCAG shall not grant any appeal based upon the following:



1. Any other criteria other than the criteria in Section I.C above.
2. A local jurisdiction’s existing zoning ordinance and land use restrictions, including but not limited to, the contents of the local jurisdiction’s current general plan. Pursuant to Government Code Section 65584.04(e)(2)(B), SCAG may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality, but shall consider the potential for increased residential development under alternative zoning ordinances and land use restrictions.
3. Any local ordinance, policy, voter-approved measure or standard limiting residential development. Pursuant to Government Code Section 65584.04(g)(1), any ordinance, policy, voter-approved measure, or standard of a city or county that directly or indirectly limits the number of residential building permits shall not be a justification for a determination or a reduction in a city’s or county’s share of regional housing need.
4. Prior underproduction of housing in a jurisdiction from the previous regional housing need allocation. Pursuant to Government Code Section 65584.04)(g)(2), prior underproduction of housing in a jurisdiction from the previous housing need allocation, as determined by each jurisdiction’s annual production report submitted to Government Code Section 65400(a)(2)(H) cannot be used as a justification for a determination or reduction in a jurisdiction’s share of the regional housing need.
5. Stable population numbers in a jurisdiction. Pursuant to Government Code Section 65584.04(g)(3), stable population growth from the previous regional housing needs cycle cannot be used as a justification for a determination or reduction in a jurisdiction’s share of the regional housing need.

**E. COMMENTS ON APPEALS**

At the close of the appeals period as set forth in I.A., SCAG shall notify all jurisdictions within the region and HCD of all appeals and shall make all materials submitted in support of each appeal available on its website after the close of the appeals filing period. Local jurisdictions and HCD may comment on one or more appeals within the 45 days following the end of the appeals filing period. All comments must be filed by 5:00 p.m. December 10, 2020. No late comments shall be accepted by SCAG.

**F. HEARING BODY**

SCAG’s Regional Council has delegated the responsibility of considering appeals regarding draft allocations to the RHNA Subcommittee, also referred to as the RHNA Appeals Board. All provisions of the RHNA Subcommittee’s charter shall apply with respect to the membership and conduct of the appeal hearings. Per the RHNA Subcommittee charter, which was adopted on February 7, 2019 by the Regional Council, ex-officio members may participate as non-voting members of the RHNA Subcommittee and by extension the RHNA Appeals Board, and are not counted for purposes of a quorum. Also per the RHNA Subcommittee charter, all decisions made by the RHNA Appeals Board are considered final and will not be reviewed by the SCAG CEHD Committee or Regional Council.

**G. APPEAL HEARING**

SCAG shall conduct one public hearing to consider all appeals filed and comments received on the appeals no later than January 10, 2021. This public hearing may be continued (over several days if necessary) until all appeals are heard. Notice shall be provided to the appealing jurisdictions, commenting jurisdictions, and HCD at least 21 days in advance of the hearing. Per Government Code Section 65584.05(i), SCAG may extend the deadline to conduct the appeals hearing by up to thirty (30) days.

The appeal hearing may take place provided that each county is represented either by a member or alternate of the RHNA Appeals Board. Alternates are permitted to participate in the appeal hearing, provided however, that each county shall only be entitled to one vote when deciding on the appeal. Ex-officio members may participate as non-voting members of the RHNA Appeals Board and are not counted for purposes of a quorum. In alignment with the adopted RHNA Subcommittee charter, in the event the hearing involves the member’s or alternate’s respective jurisdiction, the member or alternate may elect not to participate in the discussion and vote by the RHNA Subcommittee regarding such appeal.

Due to the public health situation that began in late Winter 2020, RHNA appeals hearings may be conducted via teleconference per State-adopted emergency amendments to the Brown Act. SCAG staff will continue to apprise the public on any updates to meeting procedures and will include all information in the public noticing of the appeal hearings.

**Appeal Hearing Procedures**

The hearing(s) shall be conducted to provide applicants and jurisdictions that did not file appeals but are the subject of an appeal, with the opportunity to make their case regarding a change in their draft regional housing need allocation or another

jurisdiction's allocation, with the burden on the applicants to prove their case. The appeals hearings will be organized by the specific jurisdiction subject to an appeal or appeals and will adhere to the following procedures:

**1. Initial Arguments**

Applicants who have filed an appeal for a particular jurisdiction will have an opportunity to present their request and reasons to grant the appeal. In the event of multiple appeals filed for a single jurisdiction, the subject jurisdiction will present their argument first if it has filed an appeal on its own draft RHNA allocation. Applicants may present their case either on their own, or in coordination with other applicants, but each applicant shall be allotted five (5) minutes each. If the subject jurisdiction did not file an appeal on its own draft RHNA allocation, it will be given an opportunity to present after all applicants have provided initial arguments on their filed appeals. Any presentation from the jurisdiction who did not appeal but is the subject of the appeal is limited to five (5) minutes unless it is responding to more than one appeal, in which case the jurisdiction is limited to eight (8) minutes.

**2. Staff Response**

After initial arguments are presented, SCAG staff will present their recommendation to approve or deny the appeals filed for the subject jurisdiction. The staff response is limited to five (5) minutes .

**3. Rebuttal**

Applicants and the jurisdiction who did not file an appeal but is the subject of the appeal may elect to provide a rebuttal but are limited to the arguments and evidence presented in the staff response. Each applicant and the subject jurisdiction that did not file an appeal on its own draft RHNA allocation will be allotted three (3) minutes each for a rebuttal.

**4. Extension of Time Allotment**

The Chair of the Appeals Board may elect to grant additional time for any presentation, staff response, or rebuttal in the interest of due process and equity.

**5. Appeal Board Discussion and Determination**

After arguments and rebuttals are presented, the RHNA Appeals Board may ask questions of applicants, the subject jurisdiction (if present), and SCAG staff. The Chair of the Appeals Board may request that questions

from the Appeals Board be asked prior to a discussion among Appeals Board members. Any voting Board member may make a motion regarding the appeal(s) for the subject jurisdiction. The Appeals Board is encouraged to make a single determination on the subject jurisdiction after hearing all arguments and presentations on each subject jurisdiction.

The RHNA Appeals Board need not adhere to formal evidentiary rules and procedures in conducting the hearing. An appealing jurisdiction may choose to have technical staff present its case at the hearing. At a minimum, technical staff should be available at the hearing to answer any questions of the RHNA Appeals Board.

**H. DETERMINATION OF APPEAL**

The RHNA Appeals Board shall issue a written final determination on all filed appeals after the conclusion of the public hearing(s). The written final determination shall consider all arguments and comments presented on revising the draft RHNA allocation of the subject jurisdiction and make a determination for each subject jurisdiction. The final determinations shall be based upon the information and methodology set forth in Government Code section 65584.04 and whether the revision is necessary to further the objectives listed in Government Code section 65584(d). The final determination shall include written findings as to how the determination is consistent with Government Code section 65584.05. The decision of the RHNA Appeals Board shall be final, and local jurisdictions shall have no further right to appeal.

In accordance with existing law, the final determination on an appeal by the RHNA Subcommittee may require the adjustment of allocation of a local jurisdiction that is not the subject of an appeal. Specific adjustments to jurisdictions not the subject of an appeal as a result of an appeal will be included as part of the Appeal Board’s determination. These specific adjustments may be excluded from the cumulative total adjustments required to be reallocated as described in Section II of these Appeals Guidelines if it is included as part of the appeals determination of the subject jurisdiction.

**I. ALTERNATIVE DATA REQUIREMENTS**

To the extent a local jurisdiction submits admissible alternative data or evidentiary documentation to SCAG in support of its appeal, such alternative data shall meet the following requirements:

1. The alternative data shall be readily available for SCAG’s review and verification. Alternative data should not be constrained for use by proprietary conditions or other conditions rendering them difficult to obtain or process.
2. The alternative data shall be accurate, current, and reasonably free from defect.
3. The alternative data shall be relevant and germane to the local jurisdiction’s basis of appeal.
4. The alternative data shall be used to support a logical analysis relating to the local jurisdiction’s request for a change to its draft regional housing need allocation.

**II. POST-APPEAL REALLOCATION OF REGIONAL HOUSING NEED**

In accordance with existing law (*see*, Government Code Section 65584.05(g)), after the conclusion of the appeals process, SCAG shall total the successfully appealed housing need allocations, except for adjustments made to jurisdictions not the subject of an appeal as determined by the Appeals Board in Section I.H. If the adjustments total seven percent (7%) or less of the regional housing need, SCAG shall distribute the adjustments proportionally, to all local jurisdictions. For purposes of these procedures, proportional distribution shall be based on the share of regional need after the appeals are determined and prior to the required redistribution.

If the adjustments total more than seven percent (7%) of the regional housing need, existing law requires that SCAG to develop a methodology to distribute the amount greater than seven percent to local governments. In this situation, SCAG will redistribute the amount greater than the seven percent based on the “residual” existing need calculation included in the adopted final RHNA methodology. To be consistent with the “residual” existing need calculation, successfully appealed units above the seven percent threshold will be redistributed to each county based on their proportion of total successful appeals. Fifty percent (50%) of each county’s amount above the regional seven percent will be redistributed within the county based on population within a High Quality Transit Area (HQTA) and fifty percent (50%) of the amount will be redistributed within the county based on share of regional jobs accessible. Communities designated as disadvantaged, defined in the Final RHNA Methodology as having more than fifty percent (50%) of their population in lower resource areas, will be exempt from redistribution of the amount greater than seven percent. For more information regarding the existing need distribution in the Final RHNA Methodology, please refer to Exhibit B SCAG’s adopted Final RHNA Methodology.

**III. FINAL RHNA PLAN**

After SCAG reallocates units to all local jurisdictions resulting from successful appeals, SCAG's Regional Council shall review and consider adoption of the Final RHNA Plan for SCAG's 6<sup>th</sup> cycle RHNA. This is scheduled to occur on February 4, 2021.

List of Exhibits

Exhibit A: RHNA Appeal Request Form

Exhibit B: Final RHNA Methodology

Exhibit C:

- ) Government Code Section 65580
- ) Government Code Section 65584
- ) Government Code Section 65584.04
- ) Government Code Section 65584.05

Exhibit D: RHNA Subcommittee Charter

## Final RHNA Methodology

### EXECUTIVE SUMMARY

*SCAG is required to develop a final RHNA methodology to distribute existing and projected housing need for the 6th cycle RHNA for each jurisdiction, which will cover the planning period October 2021 through October 2029. Following extensive feedback from stakeholders during the proposed methodology comment period and an extensive policy discussion, SCAG’s Regional Council voted to approve the Draft RHNA Methodology on November 7, 2019, as described below, and provide it to the State Department of Housing and Community Development (HCD) for their statutory review. On January 13, 2020, HCD completed its review of the draft methodology and found that it furthers the five statutory objectives of RHNA and on March 4, 2020, SCAG’s Regional Council voted to approve the Final RHNA Methodology. The overall framework for this methodology is included in the table below and further described in the rest of this document.*

| Projected need             | Existing need                                | Income categories   |
|----------------------------|--|---|
| Household growth 2020-2030 | Transit accessibility (HQTA population 2045) | 150% social equity adjustment minimum   |
| Future vacancy need        | Job accessibility                            | 0-30% additional adjustment for areas with lowest or highest resource concentration |
| Replacement need           | Residual distribution within the county      |   |

### HOUSING CRISIS

There is no question that there is an ongoing housing crisis throughout the State of California. A variety of measures indicate the extent of the crisis including overcrowding and cost-burdened households, but the underlying cause is due to insufficient housing supply despite continuing population growth over recent decades.

As part of the RHNA process SCAG must develop a final RHNA methodology, which will determine each jurisdiction’s draft RHNA allocation as a share of the regional determination of existing and projected housing need provided by the California Department of Housing and Community Development (HCD). There are several requirements outlined by Government Code Section 65584.04, which will be covered in different sections of this packet:

- ) Allocation methodology, per Government Code 65584.04(a)
- ) How the allocation methodology furthers the objectives State housing law, per GC 65584.04(f)



- ) How local planning factors are incorporated into the RHNA methodology, per GC 65584.04(f)
- ) Furthering the objectives of affirmatively furthering fair housing (AFFH), per GC 65584.04(d)
- ) Public engagement, per GC 65584.04(d)

Additionally, SCAG has developed a dynamic estimator tool and data appendix that contains a full set of various underlying data and assumptions to support the methodology. Due to the size of the appendix, a limited number of printed copies are available. SCAG has posted the dynamic estimator tool and full methodology appendix, on its RHNA webpage: [www.scag.ca.gov/rhna](http://www.scag.ca.gov/rhna).

Per State housing law, the RHNA methodology must distribute existing and projected housing need to all jurisdictions. The following section provides the final methodology for distributing projected and existing need to jurisdictions from the RHNA regional determination provided by the California Department of Housing and Community Development (HCD) pursuant to Government Code Section 65584.01.

#### Guiding Principles for RHNA Methodology

In addition to furthering the five objectives pursuant to Government Code 65585(d), there are several guiding principles that SCAG staff has developed to use as the basis for developing the distribution mechanism for the RHNA methodology. These principles are based on the input and guidance provided by the RHNA Subcommittee during their discussions on RHNA methodology between February 2019 and June 2019.

1. The housing crisis is a result of housing building not keeping up with growth over the last several decades. The RHNA allocation for all jurisdictions is expected to be higher than the 5<sup>th</sup> RHNA cycle.
2. Each jurisdiction must receive a fair share of their regional housing need. This includes a fair share of planning for enough housing for all income levels, and consideration of factors that indicate areas that have high and low concentration of access to opportunity.
3. It is important to emphasize the linkage to other regional planning principles to develop more efficient land use patterns, reduce greenhouse gas emissions, and improve overall quality of life.

The jurisdictional boundaries used in the recommended RHNA methodology will be based on those as of August 31, 2016. Spheres of influence in unincorporated county areas are considered within unincorporated county boundaries for purposes of RHNA.

#### Proposed RHNA Allocation Methodology

The proposed RHNA methodology, which was released for public review on August 1, contained three (3) options to distribute HCD's regional determination for existing and projected need for the

SCAG region. HCD provided SCAG a final regional determination of 1,341,827 units for the 6<sup>th</sup> cycle RHNA on October 15, 2019.<sup>1</sup>

The three options were developed based on RHNA Subcommittee feedback on various factors at their meetings between February and June 2019 and feedback from stakeholders. SCAG solicited formal public comment on the three options and any other factors, modifications, or alternative options during the public comment period, which commenced on August 1 and concluded on September 13, 2019.

Four public hearings were conducted to formally receive verbal and written comments on the proposed RHNA methodology, in addition to one public information session with a total participation of approximately 250 people. Almost 250 written comments were submitted to SCAG specifically on the proposed methodology and over 35 verbal comments were shared at four (4) public hearings held in August 2019.

#### Draft and Final RHNA Allocation Methodology

Based on comments received during the public comment period, staff recommended a combination of the three options in the proposed methodology further enhanced by factors specifically suggested by stakeholders.

On November 7, 2019, SCAG's Regional Council voted to approve the Draft RHNA Methodology. The approved draft methodology included modifications to the staff-recommended draft methodology for calculating existing housing need to more closely align the methodology with job and transit accessibility factors.

On January 13, 2020, HCD completed their statutory review and found that SCAG's Draft RHNA Methodology furthers the five statutory objectives of RHNA, which allows SCAG to finalize the RHNA methodology and issue draft RHNA allocations to each individual jurisdiction. HCD's comment letter, which can be found at [www.scag.ca.gov/rhna](http://www.scag.ca.gov/rhna), notes:

*"HCD has completed its review of the methodology and finds that the draft SCAG RHNA methodology furthers the five statutory objectives of RHNA. HCD acknowledges the complex task of developing a methodology to allocate RHNA to 197 diverse jurisdictions while furthering the five statutory objectives of RHNA. This methodology generally distributes more RHNA, particularly lower income RHNA, near jobs, transit, and resources linked to long term improvements of life outcomes. In particular, HCD applauds the use of objective factors specifically linked the statutory objectives in the existing need methodology."*

Following this finding, staff recommended the draft RHNA methodology as the final RHNA methodology. On March 5, 2020, SCAG's Regional Council approved Resolution No. 20-619-2

<sup>1</sup> On September 5, 2019, the SCAG Regional Council voted to object to HCD the regional determination of 1,344,740, per Government Code Section 65584.01, that was provided on August 15, 2019. After review of SCAG's objection letter, HCD provided a final regional determination of 1,341,827 units on October 15, 2019.

adopting the Final RHNA Methodology for the Sixth Housing Element Cycle. Following the formal distribution of draft RHNA allocations based on the Final RHNA methodology and a separate appeals phase described in Government Code 65584.05 et seq., RHNA allocations will be finalized in approximately October 2020.

The next section describes the final RHNA methodology mechanism to distribute the 1,341,827 housing units determined by HCD to all SCAG jurisdictions.

Determining Existing Need and Projected Need

SCAG’s final RHNA methodology starts with the total regional determination provided by HCD and separates existing need from projected need.

Projected need is considered as household growth for jurisdictions between the RHNA projection period between July 1, 2021 and October 1, 2029, in addition to a calculated future vacancy need and replacement need. For projected household growth, SCAG’s Connect SoCal growth forecast for the years 2020-2030 is used as the basis for calculating projected housing unit need for the region. The anticipated growth in households over this period is multiplied by 0.825 to approximate growth during the 8.25-year RHNA projection period of July 1, 2021 to October 1, 2029.

For several jurisdictions, SCAG’s growth forecast includes projected household growth on tribal land. For these jurisdictions, SCAG’s estimate of household growth on tribal land from July 1, 2021 to October 1, 2029 is subtracted from the jurisdictional projected household growth (see note in the accompanying dynamic estimator tool). A vacancy adjustment of 1.5% for owner-occupied units and 5% for renter-occupied units representing healthy-market vacancy will be applied to projected household growth to determine future vacancy need. Next a replacement need is added, which is an estimate of expected replacement need over the RHNA period. **Based on these components, the regional projected need is 504,970 units.**

Existing need is considered the remainder of the regional determination after projected need is subtracted. **Based on this consideration, the regional existing need is 836,857 units.**

**Determining a Jurisdiction’s RHNA Allocation (Existing and Projected Need)**

In determining the existing need and projected need for the region, the methodology applies a three-step process to determine a jurisdiction’s RHNA allocation by income category:

1. Determine a jurisdiction’s projected housing need
  - a. Assign household growth to jurisdictions based on SCAG’s Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy Growth Forecast between 2020 and 2030
  - b. Calculate a jurisdiction’s future vacancy need by applying a healthy market vacancy rate separately to the jurisdiction’s owner and renter households
  - c. Assign a replacement need to jurisdictions based on each jurisdiction’s share of regional net replacement need based on information collected from the replacement need survey submitted by local jurisdictions

2. Determine a jurisdiction’s existing housing need
  - a. Assign 50 percent of regional existing need based on a jurisdiction’s share of region’s population within the high quality transit areas (HQTAs) based on future 2045 HQTAs
  - b. Assign 50 percent of regional existing need based on a jurisdiction’s share of the region’s jobs that can be accessed within a 30-minute driving commute
  - c. For extremely disadvantaged communities (hereafter “DACs,” see definition below), identify residual existing need, which is defined herein as total housing need in excess of household growth between 2020 and 2045<sup>2</sup>. DACs are jurisdictions with more than half of the population living in high segregation and poverty or low resource areas as defined by the California Tax Credit Allocation Committee (TCAC)/HCD Opportunity Index Scores further described in the document.
  - d. Reallocate residual existing need by county to non-DAC jurisdictions within the same county based on the formula in (a) and (b) above, i.e. 50% transit accessibility and 50% job accessibility.
  
3. Determine a jurisdiction’s total housing need
  - a. Add a jurisdiction’s projected housing need from (1) above to its existing housing need from (2) above to determine its total housing need.
  
4. Determine four RHNA income categories (very low, low, moderate, and above moderate)
  - a. Use a minimum 150% social equity adjustment
  - b. Add an additional percentage of social equity adjustment to jurisdictions that have a high concentration of very low or very high resource areas using the California Tax Credit Allocation Committee (TCAC)’s index scoring
    - i. Add a 10% social equity adjustment to areas that are designated as 70-80% very high or very low resource area
    - ii. Add a 20% social equity adjustment to areas that are designated as 81-90% very high or very low resource area
    - iii. Add a 30% social equity adjustment to areas that are designated as 91-100% very high or very low resource area

| Methodology Component               | Assigned units |
|-------------------------------------|----------------|
| Projected need: Household growth    | 466,958        |
| Projected need: Future vacancy need | 14,467         |
| Projected need: Replacement need    | 23,545         |
| Projected need subtotal             | 504,970        |

<sup>2</sup> Since HCD’s regional determination of 1,341,827 exceeds SCAG’s 2020-2045 household growth forecast of 1,297,000 by 3.46 percent, for the purposes of existing need allocation, exceeding “local input” or more accurately, Connect SoCal Growth Forecast, household growth shall mean exceeding 1.0368 times household growth.

|                                      | Percentage of Existing Need | Assigned units   |
|--------------------------------------|-----------------------------|------------------|
| Existing need: Transit accessibility | 50%                         | 418,429          |
| Existing need: Job accessibility     | 50%                         | 418,428          |
| Existing need subtotal               |                             | 836,857          |
| <b>Total regional need</b>           |                             | <b>1,341,827</b> |

**Step 1: Determine Projected Housing Need**

The first step of the RHNA methodology is to determine a jurisdiction’s projected need. From the regional determination, projected need is considered to be regional household growth, regional future vacancy need, and regional replacement need.



To determine a jurisdiction’s projected need, the methodology uses a three-step process:

- a. Determine the jurisdiction’s regional projected household growth based on local input
- b. Determine future vacancy need based on a jurisdiction’s existing composition of owner and renter households and apply a vacancy rate on projected household growth based on the following:
  - a. Apply a 1.5% vacancy need for owner households
  - b. Apply a 5.0% vacancy need for renter households
- c. Determine a jurisdiction’s net replacement need based on replacement need survey results

**Step 1a: Projected Household Growth**

SCAG’s Connect SoCal regional growth forecast reflects recent and past trends, key demographic and economic assumptions, and local, regional, state, and national policy. SCAG’s regional growth forecasting process also emphasizes the participation of local jurisdictions and other stakeholders. The growth forecast process kicked off on May 30, 2017 with a panel of experts meeting wherein fifteen academic scholars and leading practitioners in demographics and economics were invited to review key input assumptions for the growth forecast including expected job growth, labor force

participation, birth rates, immigration and household formation rates. SCAG staff then incorporated the recommendations of the panel of experts into a preliminary range of population, household, and employment growth figures for 2016, 2020, 2030, 2035, and 2045 for the region and six counties individually.

SCAG further projects jurisdiction-level and sub-jurisdiction-level employment, population, and households using several major data sources, including:

- California Department of Finance (DOF) population and household estimates;
- California Employment Development Department (EDD) jobs report by industry;
- 2015 existing land use and General Plans from local jurisdictions;
- 2010 Census and the latest ACS data (2013-2017 5-year samples);
- County assessor parcel databases;
- 2011 and 2015 Business Installment data from InfoGroup; and
- SCAG's 2016 RTP/SCS growth forecast.

On October 31, 2017, the preliminary small area (i.e. jurisdiction and sub-jurisdiction) growth forecasts were released to local jurisdictions for their comments and input. This kicked off SCAG's *Bottom-Up Local Input and Envisioning Process* which provided each local jurisdiction with their preliminary growth forecast information as well as several other data elements both produced by SCAG and other agencies which are related to the development of Connect SoCal. Data map books were generated and provided electronically and in hard copy format and included detailed parcel-level land use data, information on resource areas, farmland, transportation, geographical boundaries and the draft growth forecast. Complete information on the Data map books and the Bottom-Up Local Input and Envisioning Process can be found at <http://scagrtpscs.net/Pages/DataMapBooks.aspx>. Over the next eight months, SCAG staff conducted one-on-one meetings with all 197 local jurisdictions to explain methods and assumptions behind the jurisdiction and sub-jurisdiction growth forecast as well as to provide an opportunity to review, edit, and approve SCAG's preliminary forecast for population, employment, and households for 2016, 2020, 2030, 2035, and 2045.

Between October 2018 and February 2019, SCAG reviewed local input on the growth forecast and other data map book elements. The local input growth forecast was evaluated at the county and regional level for the base year of 2016 and the horizon year of 2045 and was found to be technically sound. Specifically, as it relates to SCAG's local input household forecast:

- The forecast generates a 2045 regional unemployment rate of 4.7 percent which is reasonable based on past trends and ensured that the forecast is balanced, i.e. there are not too many jobs for the number of anticipated workers
- The forecast generates a 2045 population-to-household ratio of 2.9 which is consistent with the preliminary forecast and reflects expert-anticipated decreases in this ratio, ensuring that there are not too many people for the anticipated number of households region-wide
- From 2020-2045, the forecast anticipates household growth of 21 percent and population growth of 15 percent, indicating an alleviation of the region's current housing shortage over this future period.

SCAG's growth forecast for the years 2020-2030 is used as the basis for calculating projected housing unit need. Because the 6th cycle RHNA projection period covers July 1, 2021 through October 15, 2029, it is necessary to adjust reported household growth between 2020 and 2030 and adjust it to an 8.25 year projection period. The anticipated growth in households over this period is multiplied by 0.825 to approximate growth during the 8.25-year RHNA projection period (July 1, 2021 to October 15, 2029).

### Step 1b: Future Vacancy Need

The purpose of a future vacancy need is to ensure that there are enough vacant units to support a healthy housing market that can genuinely accommodate projected household growth. An undersupply of vacant units can prevent new households from forming or moving into a jurisdiction. Formulaically, future vacancy need is a percentage applied to the jurisdiction's household growth by tenure type (owner and renter households). While individual jurisdictions may experience different vacancy rates at different points in time, future vacancy need is independent of existing conditions and instead is a minimum need to support household growth.

To calculate a jurisdiction's future vacancy need, its proportion of owner-occupied units and renter-occupied units are determined using American Community Survey (ACS) 2013-2017 data—the most recent available at the time of the draft methodology's development. The percentages are applied to the jurisdiction's projected household growth from the previous step, which results in the number of projected households that are predicted to be owners and those that are predicted to be renters.

Next, two different vacancy rates are applied based on the regional determination provided by HCD. The recommended methodology uses 1.5 percent for owner-occupied units and a rate of 5 percent for renter-occupied units. The difference is due to the higher rates of turnover generally reported by renter units in comparison to owner-occupied units. The vacancy rates are applied to their respective tenure category to determine how many future vacant units are needed by tenure and then added together to get the total future vacancy need.

### Step 1c: Replacement Need

Residential units are demolished for a variety of reasons including natural disasters, fire, or desire to construct entirely new residences. Each time a unit is demolished, a household is displaced and disrupts the jurisdiction's pattern of projected household growth. The household may choose to live in a vacant unit or leave the jurisdiction, of which both scenarios result in negative household growth through the loss of a vacant unit for a new household or subtracting from the jurisdictions number of households.

For these reasons, replacement need is a required component of the regional determination provided by HCD. The methodology's replacement need will be calculated using a jurisdiction's net replacement need based on data submitted for the replacement need survey, which was conducted between March and April 2019.

Each jurisdiction's data on historical demolitions between reporting years 2008 and 2018, which was collected from the California Department of Finance (DOF), was tabulated and provided to

jurisdictions in the replacement need survey. Jurisdictions were asked to provide data on units that replaced the reported demolished units. A net replacement need was determined based on this information for each jurisdiction.

After determining each of the projected housing need components, they are combined to determine a jurisdiction’s projected housing need.

**Step 2: Determine Existing Housing Need**

After determining a jurisdiction’s projected need, the next step is to determine a jurisdiction’s existing need. Following the above discussion and based on HCD’s determination of total regional housing need, existing need is defined as the total need minus the projected need—approximately 62 percent of the entire regional determination. SCAG’s Regional Council determined that the regional existing need be split into two parts:

- ) Fifty (50) percent on population near transit (HQTAs), or 31 percent of total need
- ) Fifty (50) percent on job accessibility, or 31 percent of total need

Regional Existing Need



Jurisdiction Existing Need



**Step 2a: Share of Regional HQTAs Population**

The next step involves the consideration of proximity to transit to distribute fifty (50) percent of the region’s existing housing need, in an effort to better align transportation and housing planning.

For several years, SCAG has developed a measure called High Quality Transit Areas (HQTAs) which are areas within a half-mile of transit stations and corridors with at least a fifteen (15) minute headway during peak hours for bus service. HQTAs are based on state statutory definitions of high-quality transit corridors (HQTCS) and major transit stops. For the development of Connect SoCal, freeway-running HQTCS have been excluded from HQTAs to better reflect the level of service they provide to nearby areas.

Planned HQTCS and major transit stops for future years are improvements that are expected to be implemented by transit agencies by the Connect SoCal horizon year of 2045. SCAG updates its inventory with the quadrennial adoption of each RTP/SCS; however, planning and environmental



impact studies may be completed by transit agencies more frequently. Therefore, HQTAs in future years reflect the best information currently available to SCAG regarding the location of future high-quality transit service accessibility. More detailed information on HQTA-related definitions is available in the data appendix.

50 percent of the regional existing housing need will be distributed based on a jurisdiction's share of regional residential population within an HQTA, based on the HQTA boundaries used in the final Connect SoCal Plan anticipated to be adopted by SCAG in April 2020. Not all jurisdictions have an HQTA within their jurisdictional boundaries and thus may not receive existing need based on this factor.

### Step 2b: Job Accessibility

The concept behind job accessibility is to further the statewide housing objective and SCAG's Connect SoCal objective of improving the relationship between jobs and housing. While none of the three options presented in the proposed RHNA methodology included a factor directly based on job accessibility, an overwhelming number of public comments expressed support for the methodology to include this specific component.

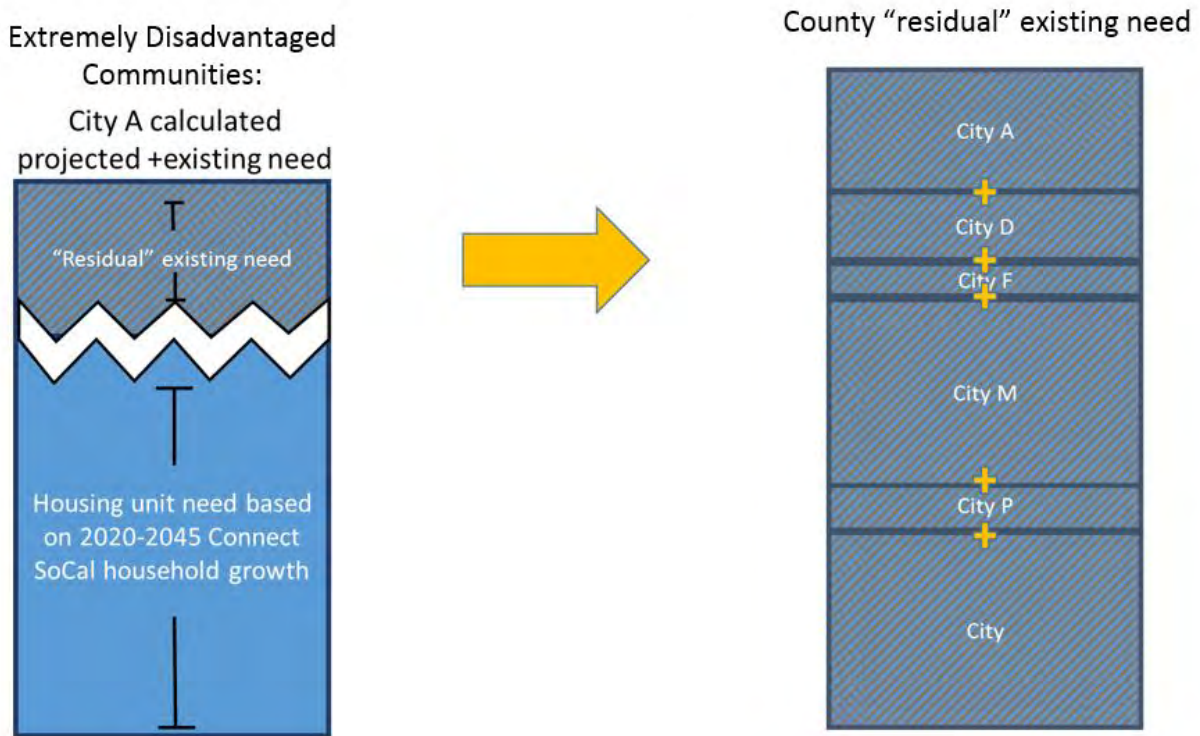
The methodology assigns fifty (50) percent of regional existing need based on job accessibility. Job accessibility is based on the share of the region's jobs accessible by a thirty (30) minute commute by car in 2045. Importantly, the RHNA methodology's job access factor is *not* based on the number of jobs within a jurisdiction from SCAG's Connect SoCal Plan or any other data source. Rather, it is a measure based on of how many jobs can be *accessed* from that jurisdiction within a 30-minute commute, which includes jobs in other jurisdictions. Since over 80 percent of SCAG region workers live and work in different jurisdictions, genuinely improving the relationship between jobs and housing necessitates an approach based on job access rather than the number of jobs in a jurisdiction.

These job accessibility data are derived at the transportation analysis zone (TAZ) level from travel demand modelling output from SCAG's final Connect SoCal Plan. SCAG realizes that in many jurisdictions, especially larger ones, job access many not be uniform in all parts of the city or county. However, since the RHNA process requires allocating housing need at the jurisdictional-level, staff reviewed several ways to measure the typical commuter's experience in each jurisdiction. Ultimately, the share of the region's jobs that could be accessed by a jurisdiction's *median TAZ* was found to be the best available measure of job accessibility for that jurisdiction. Based on this measure, in central parts of the region, residents of some jurisdictions can access as much as 23 percent of the region's jobs in a 30 minute car commute, while the average across all the region's jurisdictions was 10.5 percent.

This measure is multiplied by a jurisdiction's share of total population in order to allocate housing unit need to jurisdictions. This important step ensures that the potential beneficiaries of greater accessibility (i.e., the population in a jurisdiction with good job access) are captured in the methodology. Based on this approach, jurisdictions with limited accessibility to jobs will receive a smaller RHNA allocation based on this component.

### Step 2c: "Residual" Adjustment Factor for Existing Need

In many jurisdictions defined as “disadvantaged communities (DACs)”, the calculated projected and existing need is higher than its household growth between 2020 and 2045, as determined by the SCAG Growth Forecast used in the final Connect SoCal regional plan. Those DAC jurisdictions that have a need as determined by the RHNA methodology as higher than its 2020 to 2045 household growth<sup>3</sup> will be considered as generating “residual” existing need. Residual need will be subtracted from jurisdictional need in these cases so that the maximum a DAC jurisdiction will receive for existing need is equivalent to its 2020 to 2045 household growth. Not all DAC jurisdictions will have a residual existing need.



A county total of residual existing need will be calculated and then redistributed with the same county to non-DAC jurisdictions. The redistribution will be assigned to jurisdictions based on transit accessibility (50%) and job accessibility (50%), and will exclude DAC jurisdictions which have over 50% of their populations in very low resource areas using California Tax Credit Allocation Committee (TCAC)/HCD Opportunity Indices.

Very low resource areas are areas that have least access to opportunity as measured by indicators such as poverty levels, low wage job proximity, math and reading proficiency, and pollution levels. This mechanism will help to further AFFH objectives since residual existing RHNA need, which includes additional affordable units, will be assigned to areas that are not identified as those with the

<sup>3</sup> Since HCD’s regional determination of 1,341,827 exceeds SCAG’s 2020-2045 household growth forecast of 1,297,000 by 3.68 percent, for the purposes of existing need allocation, exceeding “local input” or “Connect SoCal” household growth shall mean exceeding 1.0368 times household growth.

lowest resources, which will increase access to opportunity. A full discussion on the TCAC opportunity indicators is provided in the following section on social equity adjustment. Data relating to the TCAC opportunity indicator categories for each jurisdiction can be found in the RHNA methodology data appendix and in the accompanying RHNA allocation estimator tool on the RHNA webpage: [www.scag.ca.gov/rhna](http://www.scag.ca.gov/rhna).

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**Step 3: Determining Total Housing Need**

After determining a jurisdiction’s projected housing need from step 1 and its existing housing need from step 2, the sum of the projected and existing need becomes a jurisdiction’s total housing need.



**Step 4: Determining Four Income Categories through Social Equity Adjustment**

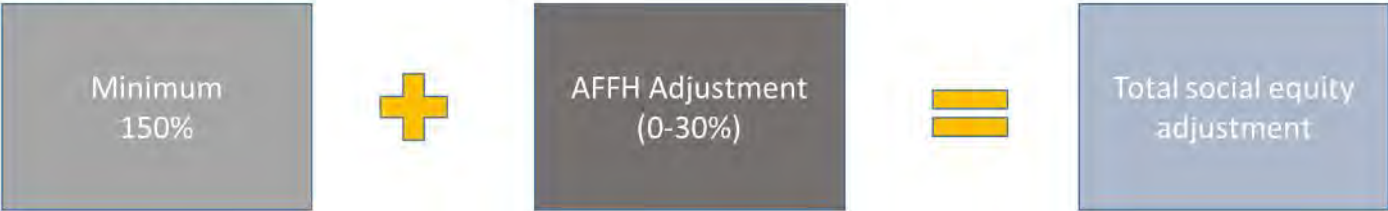
After determining a jurisdiction’s total RHNA allocation, the next step is to assign the total into four RHNA income categories. The four RHNA income categories are:

- ) Very low (50 percent or less of the county median income);
- ) Low (50-80 percent);
- ) Moderate (80 to 120 percent); and
- ) Above moderate (120 percent and above)

The fourth RHNA objective specifically requires that the RHNA methodology allocate a lower proportion of housing need in jurisdictions that already have a disproportionately high concentration of those households in comparison to the county distribution. Additionally, the fifth objective, affirmatively furthering fair housing (AFFH), requires that the RHNA methodology further the objectives of addressing significant disparities in housing needs and access to opportunity in order to overcome patterns of segregation.

To further these two objectives, the RHNA methodology includes a minimum 150 percent social equity adjustment and an additional 10 to 30 percent added in areas with significant populations that are defined as very low or very high resource areas, referred to as an AFFH adjustment. This determines the distribution of four income categories for each jurisdiction.

**Social equity adjustment**



A social equity adjustment ensures that jurisdictions accommodate their fair share of each income category. First, the percentage of each jurisdiction’s distribution of four income categories is determined using the county median income as a benchmark. For example, in Los Angeles County, a household earning less than \$30,552 annually, or 50 percent of the county median income, would be considered a very low income household. A household in Los Angeles County earning more than \$73,218 annually, or 120 percent of the county median income, would be counted in the above moderate category. The number of households in each category is summed and then a percentage of each category is then calculated.

For reference, below is the median household income by county.

- ) Imperial County: \$44,779
- ) Los Angeles County: \$61,015
- ) Orange County: \$81,851
- ) Riverside County: \$60,807
- ) San Bernardino County: \$57,156
- ) Ventura County: \$81,972
- ) SCAG region: \$64,114

Source: American Community Survey (ACS) 2013-2017 5-year estimates

Once a jurisdiction’s household income distribution by category is determined, the percentage is compared to the county’s percentage of existing household income distribution. For example, if a jurisdiction has an existing distribution of 30 percent of very low income households while the county is 25 percent, the jurisdiction is considered as having an overconcentration of very low income households compared to the county. A social equity adjustment ensures that the jurisdiction will be assigned a smaller percentage of very low income households for its RHNA allocation than both what it and the county currently experience.

If the jurisdiction is assigned a social equity adjustment of 150 percent, the formula to calculate its very low income percentage is:

| Household Income Level | Formula to Calculate City A Social Equity Adjustment of 150% |
|------------------------|--|
| Very Low Income        | $30\% - [(30\% - 25\%) \times 1.5] = 22.5\%$                 |

In this example, 22.5 percent of the jurisdiction’s total RHNA allocation would be assigned to the very low income category. This adjustment is lower than both its existing household income distribution (30 percent) and the existing county distribution (25 percent).

The inverse occurs in higher income categories. Assuming 20 percent of a jurisdiction’s households are above moderate income while 25 percent of the county’s households are above moderate income, the jurisdiction will be assigned a distribution of 27.5 percent for above moderate income need.

| Household Income Level | Formula to Calculate City A Social Equity Adjustment of 150% |
|------------------------|--|
| Above moderate income  | $20\% - [(20\% - 25\%) \times 1.5] = 27.5\%$                 |

If the adjustment was 100 percent a jurisdiction’s distribution would be exactly the same as the County’s distribution. Conceptually a 150 percent adjustment means that the City meets the County distribution and goes beyond that threshold by 50 percent, resulting in a higher or lower distribution than the County depending on what existing conditions are in the City. The higher the adjustment, the more noticeable the difference between the jurisdiction’s existing household income distribution and its revised distribution.

The RHNA methodology recommends a minimum of 150 percent social equity adjustment with an additional 10, 20, or 30 percent added depending on whether the jurisdiction is considered a very low or very high resource area based on its Opportunity Index score.

In 2015 the U.S. Department of Housing and Urban Development (HUD) developed a set of “Opportunity Indices” to help states and localities identify factors that contribute to fair housing issues in their region and comply with the federal Fair Housing Act. In late 2017, a Task Force convened by HCD and the California Tax Credit Allocation Committee (TCAC) released an “Opportunity mapping” tool based on these HUD indices to identify areas in California that can “offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health.”<sup>4</sup>

The TCAC and HCD Opportunity mapping tool includes a total of eleven (11) census-tract level indices to measure exposure to opportunity in local communities. The indices are based on measures of economic, environmental, and educational opportunities within communities. Regional patterns of segregation are also identified based on this tool. Below is a summary table of the 11 indices sorted by type:

| <b>Economic</b>        | <b>Environment</b>                  | <b>Education</b>             |
|------------------------|-------------------------------------|------------------------------|
| Poverty                | CalEnviroScreen 3.0 indicators      | Math proficiency             |
| Adult education        | ) Ozone                             | Reading proficiency          |
| Employment             | ) PM2.5                             | High school graduation rates |
| Low-wage job proximity | ) Diesel PM                         | Student poverty rate         |
| Median home value      | ) Drinking water<br>contaminates    |                              |
|                        | ) Pesticides                        |                              |
|                        | ) Toxic releases from<br>facilities |                              |
|                        | ) Traffic density                   |                              |
|                        | ) Cleanup sites                     |                              |
|                        | ) Groundwater threats               |                              |
|                        | ) Hazardous waste                   |                              |
|                        | ) Impaired water bodies             |                              |
|                        | ) Solid waste sites                 |                              |

<sup>4</sup> California Fair Housing Taskforce Revised opportunity Mapping Technology, Updated November 27, 2018: <https://www.treasurer.ca.gov/ctcac/opportunity/final-opportunity-mapping-methodology.pdf>

Based on its respective access to opportunity, each census tract is given a score that designates it under one of the following categories:

- ) High segregation & poverty
- ) Low resource
- ) Moderate resource
- ) High resource
- ) Highest resource

Tract-level indices were summed to the jurisdictional-level by SCAG using area-weighted interpolation. Using 2013-2017 American Community Survey population data, SCAG determined the share of each jurisdiction’s population in each of these five categories. For example:

|                                 | Lowest Resource            |              |                   |               | Very High Resource |
|---------------------------------|----------------------------|--------------|-------------------|---------------|--------------------|
| Opportunity Indicator Category  | High segregation & poverty | Low resource | Moderate resource | High resource | Highest resource   |
| City A Percentage of population | 10%                        | 10%          | 30%               | 30%           | 20%                |
| City B Percentage of population | 90%                        | 5%           | 5%                | 0%            | 0%                 |
| City C Percentage of population | 0%                         | 0%           | 10%               | 15%           | 75%                |

The recommended methodology determines high resource concentration using the “very high” resource area score. The recommended methodology determines “lowest” resource areas by combining the two lowest measures. In the above table, City B would be considered to have a much higher concentration of lower resource areas than City A. City C would be considered to have a much higher concentration of highest resource areas.<sup>5</sup>

- ) High segregation & Poverty + Low Resource = Lowest Resource
- ) Highest Resource

Jurisdictions that are identified as having between 70 and 100 percent of the population within a lowest or very high resource area are assigned an additional 10 and 30 percent social equity adjustment:

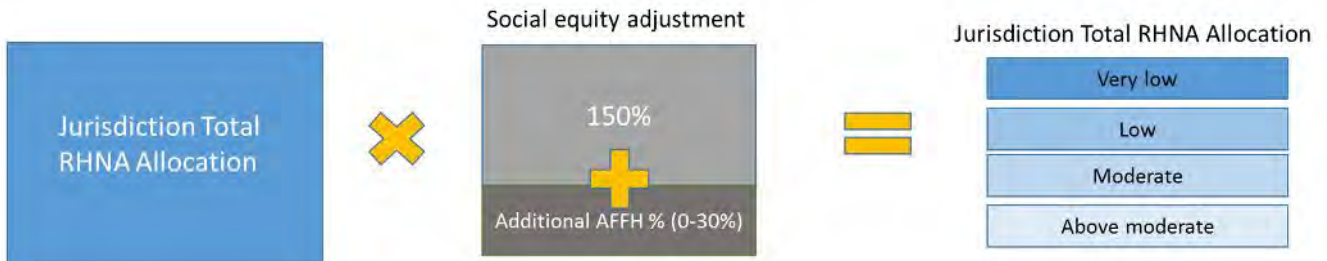
<sup>5</sup> As a cross-reference, if City B has both a high job and transit accessibility it would be exempt from the redistribution of residual existing need from the RHNA methodology’s Step 2d because more than 50 percent of its population is within a very low resource area. On the other hand City A and City C, if they have a high job and transit access, would not be exempt from receiving regional residual need because they have only 20 percent and 0 percent of their respective population within a very low resource area.

| Concentration of population within very low or very high resource area | Additional social equity adjustment |
|--|-------------------------------------|
| 70-80%   | +10%                                |
| 80-90%   | +20%                                |
| 90-100%  | +30%                                |

In the example table, City B would receive an additional social equity adjustment of 30% because 95% of its population is within a lowest resource area (sum of high segregation & poverty and low resource measures). City C would receive an additional social equity adjustment of 10% because 75% of its population is within a very high resource area. City A would not receive a further adjustment because it does not have a high enough concentration of population within either the lowest or very high resource categories.

Assigning a higher social equity adjustment based on Opportunity Indices will result in a higher percentage of affordable housing units to areas that have higher resources. Concurrently, it will assign a lower percentage of affordable housing in areas where they is already an overconcentration. Because Opportunity Indices consider factors such as access to lower wage jobs, poverty rates, and school proficiency, the social equity adjustment in the RHNA methodology will result in factors beyond simply household income distribution. This additional adjustment will help to adjust the disparity in access to fair housing across the region, furthering the AFFH objective required in State housing law.

Once the social equity adjustment is determined, it is used to assign need to the four income categories.



Final Adjustments

On a regional level the final RHNA allocation plan must be the same as the regional determination, by income category, provided by HCD. The final RHNA methodology will result in slight differences, among income categories, since income categories are required to use county distributions as benchmarks and the HCD determination does not include county-level benchmarks. For this reason, after the initial income categories are determined for jurisdictions, SCAG will apply a normalization adjustment to the draft fsRHNA allocation to ensure that the regional total by income category is maintained.



Additionally, in the event that a jurisdiction receives an allocation of zero (0) units under the RHNA methodology a minimum RHNA allocation of eight (8) units would be assigned. Government Code Section 65584.04(m)(2) requires that the final RHNA allocation plan ensure that each jurisdiction receive an allocation of units for low- and very low income households. Under these circumstances, SCAG will assign those jurisdictions a minimum of four (4) units in the very low income category and four (4) units in the low income category for a draft RHNA allocation of eight (8) units.

## Meeting the Objectives of RHNA

Government Code Section 65584.04(a) requires that the RHNA methodology furthers the five objectives of the Regional Housing Needs Assessment:

- (1) Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households.
- (2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.
- (3) Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.
- (4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.
- (5) Affirmatively furthering fair housing.
  - (e) For purposes of this section, "affirmatively furthering fair housing" means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

On January 13, 2020, HCD completed its review of SCAG's draft RHNA methodology and found that it furthers the five statutory objectives of RHNA.

## Local Planning Factors

As part of the development of the proposed RHNA methodology, SCAG must conduct a survey of planning factors that identify local conditions and explain how each of the listed factors are incorporated into the RHNA methodology. This survey, also known as the “Local Planning Factor” survey, is a specific requirement for the RHNA methodology process and is separate from the local review process of the Growth Forecast used as the basis for determining future growth in the Connect SoCal plan.

The survey was distributed to all SCAG jurisdictions in mid-March 2019 with a posted due date of May 30, 2019. One-hundred and nine (109) jurisdictions, or approximately 55%, submitted a response to the local planning factor survey. To facilitate the conversation about local planning factors, between October 2017 and October 2018 SCAG included these factors as part of the local input survey and surveyed a binary yes/no as to whether these factors impacted jurisdictions. The formal local planning factor survey was pre-populated with the pre-survey answers to help facilitate survey response. The full packet of local planning factor surveys can be downloaded at [www.scag.ca.gov/rhna](http://www.scag.ca.gov/rhna).

SCAG staff reviewed each of the submitted surveys to analyze planning factors opportunities and constraints across the region. The collected information was used to ensure that the methodology will equitably distribute housing need and that underlying challenges as a region are collectively addressed.

- (1) *Each member jurisdiction’s existing and projected jobs and housing relationship. This shall include an estimate, based on readily available data, of the number of low-wage jobs within the jurisdiction and how many housing units within the jurisdiction are affordable to low-wage workers as well as an estimate, based on readily available data, of projected job growth and projected household growth by income level within each member jurisdiction during the planning period.*

The RHNA methodology directly considers job accessibility and determines a portion of housing need for each jurisdiction based on this factor. Using transportation analysis zones as a basis, the percentage of jobs accessible within a 30 minute drive for a jurisdiction’s population is determined and then weighted based on the jurisdiction’s population size to determine individual shares of regional jobs accessible. Based on a review of other potential mechanisms to factor in jobs into the RHNA methodology, SCAG staff has determined that this mechanism most closely aligns with the goals of State housing law.

A supplemental analysis of the impact of the draft RHNA methodology’s impact on jobs-housing relationships and low-wage jobs-housing relationships was provided to the Regional Council on February 5, 2020.

- (2) *The opportunities and constraints to development of additional housing in each member jurisdiction, including all of the following:*
- (A) *Lack of capacity for sewer or water service due to federal or 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.*
  - (B) *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. The council of governments may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality, but shall consider the potential for increased residential development under alternative zoning ordinances and land use restrictions. The determination of available land suitable for urban development may exclude lands where the Federal Emergency Management Agency (FEMA) or the Department of Water Resources has determined that the flood management infrastructure designed to protect that land is not adequate to avoid the risk of flooding.*
  - (C) *Lands preserved or protected from urban development under existing federal or state programs, or both, designed to protect open space, farmland, environmental habitats, and natural resources on a long-term basis, including land zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts conversion to non-agricultural uses.*
  - (D) *County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts its conversion to non-agricultural uses.*

Consideration of the above planning factors have been incorporated into the Growth Forecast process and results by way of analysis of aerial land use data, general plan, parcel level property data, open space, agricultural land and resource areas, and forecast surveys distributed to local jurisdictions. The bottom-up Local Input and Envisioning Process, which is used as the basis for both RHNA and SCAG's Connect SoCal (Regional Transportation Plan/Sustainable Communities Strategy) started with an extensive outreach effort involving all local jurisdictions regarding their land use and development constraints. All local jurisdictions were invited to provide SCAG their respective growth perspective and input. The RHNA methodology directly incorporates local input on projected household growth, which should be a direct reflection of local planning factors such as lack of water or sewer capacity, FEMA-designated flood sites, and open space and agricultural land protection.

Prior RHNA cycles did not promote direct linkage to transit proximity and the methodology encourages more efficient land use patterns by utilizing existing as well as future planned transportation infrastructure and preserves areas designated as open space and agricultural

lands. In particular the inclusion of transit proximity places an increased emphasis on infill opportunities and areas that are more likely to support higher residential densities.

- (3) *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.*

As indicated above, the Growth Forecast used as the basis for the Connect SoCal Plan is also used as the basis for projected household growth in the RHNA methodology. The weighting of a jurisdiction’s population share within an HQTAs directly maximizes the use of public transportation and existing transportation infrastructure.

- (4) *Agreements between a county and cities in a county to direct growth toward incorporated areas of the county, and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of the jurisdiction that prohibits or restricts conversion to nonagricultural uses.*

This planning factor has been identified through the local input process and local planning factor survey collection as affecting growth within Ventura County. The urban growth boundary, known as Save Our Agricultural Resources (SOAR), is an agreement between the County of Ventura and its incorporated cities to direct growth toward incorporated areas, and was recently extended to 2050. Based on the input collected, SCAG staff has concluded that this factor is already reflected in the RHNA methodology since it was considered and incorporated into the local input submitted by jurisdictions.

- (5) *The loss of units contained in assisted housing developments, as defined in paragraph (9) of subdivision (a) of Section 65583 that changed to non-low-income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions.*

The conversion of low income units into non-low income units is not explicitly addressed through the distribution of existing and projected housing need. Staff has provided statistics in the RHNA methodology appendix on the potential loss of units in assisted housing developments. The loss of such units affects the proportion of affordable housing needed within a community and the region as a whole.

Local planning factor survey responses indicate that the impact of this factor is not regionally uniform. Many jurisdictions that replied some units are at-risk for losing their affordability status in the near future have indicated that they are currently reviewing and developing local resources to address the potential loss. Based on this, SCAG staff has determined that at-risk units are best addressed through providing data on these units as part of the RHNA methodology and giving local jurisdictions the discretion to address this factor and adequately plan for any at-risk unit loss in preparing their housing elements.

- (6) *The percentage of existing households at each of the income levels listed in subdivision (e) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent.*

An evaluation of survey responses reveals that cost-burdened households, or those who pay at least 30 percent of their household income on housing costs, is a prevalent problem throughout the region. The RHNA methodology also includes in its appendix data from the ACS 2013-2017 on cost-burdened statistics for households who pay more than 30 percent of their income on housing by owner and renter, and for renter households who pay 50 percent or more of their income on housing. The general trend is seen in both high and low income communities, suggesting that in most of the SCAG region high housing costs are a problem for all income levels.

Nonetheless a large number of jurisdictions indicated in the survey that overpaying for housing costs disproportionately impacts lower income households in comparison to higher income households. This issue is exacerbated in areas where there is not enough affordable housing available, particularly in higher income areas. For this reason, the RHNA methodology incorporates not only a 150 percent social equity adjustment, but also uses the TCAC Opportunity Indices to distribute the RHNA allocation into the four income categories in areas identified as being the highest resource areas of the region. The Opportunity Indices include a proximity to jobs indicator, particularly for low-wage jobs, which identifies areas with a high geographical mismatch between low wage jobs and affordable housing. Increasing affordable housing supply in these areas can help alleviate cost-burden experienced by local lower income households because more affordable options will be available.

The reason for using social equity adjustment and opportunity indices to address cost-burdened households rather than assigning total need is because it is impossible to determine through the methodology how and why the cost-burden is occurring in a particular jurisdiction. Cost-burden is a symptom of housing need and not its cause. A jurisdiction might permit a high number of units but still experiences cost-burden because other jurisdictions restrict residential permitting. Or, a jurisdiction might have a large number of owner-occupied housing units that command premium pricing, causing cost-burden for high income households and especially on lower income households due to high rents from high land costs. An analysis of existing need indicators by jurisdiction, which is part of the RHNA methodology data appendix, does not reveal a single strong trend to base a distribution methodology for cost-burden and thus the RHNA methodology distributes this existing need indicator regionally using social equity adjustment and Opportunity Indices rather than to where the indicators exist.

- (7) *The rate of overcrowding.*

An evaluation of survey responses indicates that there is a variety of trends in overcrowding throughout the region. Overcrowding is defined as more than 1.01 persons per room (not bedroom) in a housing unit. Some jurisdictions have responded that overcrowding is a severe issue, particularly for lower income and/or renter households, while others have

responded that overcrowding is not an issue at all. At the regional determination level HCD applied an overcrowding component, which is a new requirement for the 6<sup>th</sup> RHNA cycle. Because

Similar to cost-burden, overcrowding is caused by an accumulated housing supply deficit and is considered an indicator of existing housing need. The reason for not assigning need directly based on this indicator is because it is impossible to determine through the methodology how and why the overcrowding is occurring in a particular jurisdiction. A jurisdiction that has an overcrowding rate higher than the regional average might be issuing more residential permits than the regional average while the surrounding jurisdictions might not have overcrowding issues but issue fewer permits than the regional average. An analysis of existing need indicators by jurisdiction, which is part of the RHNA methodology data appendix, does not reveal a single strong trend to base a distribution methodology for overcrowding and thus the methodology distributes this existing need indicator regionally rather than to where the indicators exist.

While not specifically surveyed, several jurisdictions have indicated that density has affected their jurisdictions and have requested that the methodology should consider this as a factor. While density is not directly addressed as a factor, the social equity adjustment indirectly addresses density particularly for lower income jurisdictions. In housing elements, jurisdictions most demonstrate that a site is affordable for lower income households by applying a “default density”, defined in State housing law as either 20 or 30 dwelling units per acre depending on geography and population. In other words, a site that is zoned at 30 dwelling units per acre is automatically considered as meeting the zoning need for a low income household.

However there is not a corresponding default density for above moderate income zoning. Assigning a lower percentage of lower income households than existing conditions indirectly reduces future density since the jurisdiction can zone at lower densities if it so chooses. While this result does not apply to higher income jurisdictions, directing growth toward less dense areas for the explicit purpose of reducing density is in direct contradiction to the objectives of state housing law, especially for promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development pattern.

(8) *The housing needs of farmworkers.*

The RHNA methodology appendix provides data on agricultural jobs by jurisdiction as well as workers by place of residence. The survey responses indicate that most jurisdictions do not have agricultural land or only have small agricultural operations that do not necessarily require designated farmworker housing. For the geographically concentrated areas that do have farmworker housing, responses indicate that many jurisdictions already permit or are working to allow farmworker housing by-right in the same manner as other agricultural uses are allowed. Jurisdictions that are affected by the housing needs of farmworkers can be assumed to have considered this local factor when submitting feedback on SCAG’s Growth

Forecast. A number of jurisdictions reiterated their approach in the local planning factor survey response.

Similar to at-risk units, the RHNA methodology does not include a distribution mechanism to distribute farmworker housing. However, SCAG has provided data in its RHNA methodology appendix related to this factor and encourages local jurisdictions to adequately plan for this need in their housing elements.

- (9) *The 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.*

SCAG staff has prepared a map outlining the location of four-year private and public universities in the SCAG region along with enrollment numbers from the California School Campus Database (2018). Based on an evaluation of survey responses that indicated a presence of a university within their boundaries, SCAG staff concludes that most housing needs related to university enrollment are addressed and met by dormitories provided by the institution both on- and off-campus. No jurisdiction expressed concern in the surveys about student housing needs due to the presence of a university within their jurisdiction.

However, some jurisdictions have indicated outside of the survey that off-campus student housing is an important issue within their jurisdictions and are in dialogue with HCD to determine how this type of housing can be integrated into their local housing elements. Because this circumstance applies to only a handful of jurisdictions, it is recommended that housing needs generated by a public or private university be addressed in the jurisdiction's housing element if it is applicable.

- (10) *The loss of units during a state of emergency that was declared by the Governor pursuant to the California Emergency Services Act (Chapter 7 (commencing with Section 8550) of Division 1 of Title 2), during the planning period immediately preceding the relevant revision pursuant to Section 65588 that have yet to be rebuilt or replaced at the time of the analysis.*

Replacement need, defined as units that have been demolished but not yet replaced, are included as a component of projected housing need in the RHNA methodology. To determine this number, HCD reviewed historical demolition permit data between 2008 and 2017 (reporting years 2009 and 2018) as reported by the California Department of Finance (DOF), and assigned SCAG a regional replacement need of 0.5% of projected and existing need, or 34,010 units.

There have been several states of emergency declared for fires in the SCAG region that have destroyed residential units, as indicated by several jurisdictions in their local planning factor survey responses. Survey responses indicate that a total of 1,785 units have been lost regionally from fires occurring after January 1, 2018. Units lost from fires that occurred prior to January 1, 2018, have already been counted in the replacement need for the 6<sup>th</sup> RHNA cycle.



In spring 2019, SCAG conducted a replacement need survey with jurisdictions to determine units that have been replaced on the site of demolished units reported. Region wide 23,545 of the region's demolished units still needed to be replaced based on survey results. The sum of the number of units needing to be replaced based on the replacement need survey and the number of units reported as lost due to recent states of emergency, or 25,330, is lower than HCD's regional determination of replacement need of 34,010. One can reasonably conclude that units lost based on this planning factor are already included in the regional total and distributed, and thus an extra mechanism to distribute RHNA based on this factor is not necessary to meet the loss of units.

(11) *The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080.*

An assessment of survey responses indicate that a number of jurisdictions in the SCAG region are developing efforts for more efficient land use patterns and zoning that would result in greenhouse gas emissions. These include a mix of high-density housing types, neighborhood based mixed-use zoning, climate action plans, and other local efforts to reduce greenhouse gas emissions at the regional level.

The RHNA methodology includes a distribution of 50 percent of regional existing need based on a jurisdiction's share of regional population within an HQT. The linkage between housing planning and transportation planning will allow for a better alignment between the RHNA allocation plan and the Connect SoCal RTP/SCS. It will promote more efficient development land use patterns, encourage transit use, and importantly reduce greenhouse gas emissions. This will in turn support local efforts already underway to support the reduction of regional greenhouse gas emissions.

Moreover the RHNA methodology includes the Growth Forecast reviewed with local input as a distribution component, particularly for projected housing need. Local input is a basis for SCAG's Connect SoCal Plan, which addresses greenhouse gas emissions at the regional level since it is used to reach the State Air Resources Board regional targets. An analysis of the consistency between the RHNA and Connect SoCal Plan is included as an attachment to this document.

(12) *Any other factors adopted by the council of governments that further the objectives listed in subdivision (d) of Section 65584, provided that the council of governments specifies which of the objectives each additional factor is necessary to further. The council of governments may include additional factors unrelated to furthering the objectives listed in subdivision (d) of Section 65584 so long as the additional factors do not undermine the objectives listed in subdivision (d) of Section 65584 and are applied equally across all household income levels as described in subdivision (f) of Section 65584 and the council of governments makes a finding that the factor is necessary to address significant health and safety conditions.*

No other planning factors were adopted by SCAG to review as a specific local planning factor.

## Affirmatively Furthering Fair Housing (AFFH)

Among a number of changes due to recent RHNA legislation is the inclusion of affirmatively furthering fair housing (AFFH) as both an addition to the listed State housing objectives of Government Section 65588 and to the requirements of RHNA methodology as listed in Government Code Section 65584.04(b) and (c), which includes surveying jurisdictions on AFFH issues and strategies and developing a regional analysis of findings from the survey.

### AFFH Survey

The AFFH survey accompanied the required local planning factor survey and was sent to all SCAG jurisdictions in mid-March 2019 with a posted due date of May 30, 2019. Ninety (90) of SCAG's 197 jurisdictions completed the AFFH survey, though some jurisdictions indicated that they would not be submitting the AFFH survey due to various reasons. The full packet of surveys submitted prior to the development of the proposed methodology packet can be downloaded at [www.scag.ca.gov/rhna](http://www.scag.ca.gov/rhna).

Jurisdictions were asked various questions regarding fair housing issues, strategies and actions. These questions included:

- ) Describe demographic trends and patterns in your jurisdiction over the past ten years. Do any groups experience disproportionate housing needs?
- ) To what extent do the following factors impact your jurisdiction by contributing to segregated housing patterns or racially or ethnically-concentrated areas of poverty?
- ) To what extent do the following acts as determinants for fair housing and compliance issues in your jurisdiction?
- ) What are your public outreach strategies to reach disadvantaged communities?
- ) What steps has your jurisdiction undertaken to overcome historical patterns of segregation or remove barriers to equal housing opportunity?

The survey questions were based on the U.S. Department of Housing and Urban Development (HUD) Analysis of Impediments to Fair Housing Choice survey that each jurisdiction, or their designated local Housing Authority, must submit to HUD to receive Community Development Block Grant (CDBG) funds. For the AFFH survey, jurisdictions were encouraged to review their HUD-submitted surveys to obtain data and information that would be useful for submitting the AFFH survey.

Pursuant to Government Code Section 65584.04(c), the following is an analysis of the survey results.

### *Themes*

Several demographic themes emerged throughout the SCAG region based on submitted AFFH surveys. A high number of jurisdictions indicated that their senior populations are increasing and many indicated that the fixed income typically associated with senior populations might have an effect on housing affordability. Other jurisdictions have experienced an increase in minority populations, especially among Latino and Asian groups. There is also a trend of the loss of young adults (typically younger than 30) and a decrease in the number of families with children in more suburban locations due to the rise in housing costs.

### *Barriers*

There was a wide variety of barriers reported in the AFFH survey, though a number of jurisdictions indicated they did not have any reportable barriers to fair access to housing. Throughout the SCAG region, communities of all types reported that community opposition to all types of housing was an impediment to housing development. Sometimes the opposition occurred in existing low income and minority areas. Some jurisdictions indicated that high opportunity resource areas currently do not have a lot of affordable housing or Section 8 voucher units while at the same time, these areas have a fundamental misunderstanding of who affordable housing serves and what affordable housing buildings actually look like. Based on these responses, it appears that community opposition to housing, especially affordable housing and the associated stigma with affordable housing, is a prevalent barrier throughout the SCAG region.

Other barriers to access to fair housing are caused by high land and development costs since they contribute to very few affordable housing projects being proposed in higher opportunity areas. The high cost of housing also limits access to fair housing and is a significant contributing factor to disparities in access to opportunity. Increasing property values were reported across the region and some jurisdictions indicated that they are occurring in existing affordable neighborhoods and can contribute to gentrification and displacement. Additionally, during the economic downturn a large number of Black and Latino homeowners were disproportionately impacted by predatory lending practices and therefore entered foreclosure in higher numbers than other populations.

Other barriers reported in the AFFH survey include the lack of funding available to develop housing after the dissolution of redevelopment agencies in 2012. Moreover, some jurisdictions indicated that the lack of regional cooperation contributes to segregation.

### *Strategies to Overcome Barriers*

All submitted AFFH surveys indicated that their respective jurisdictions employed at least a few strategies to overcome barriers to access fair housing. These strategies ranged from local planning and zoning tools to funding assistance to innovative outreach strategies.

In regard to planning and zoning tools, a number of jurisdictions indicated they have adopted inclusionary zoning ordinances or an in-lieu fee to increase the number of affordable units within their jurisdictions. Others have adopted an accessory dwelling unit (ADU) ordinance with accommodating standards to allow for higher densities in existing single-family zone neighborhoods. A few jurisdictions indicated that they have adopted an unpermitted dwelling unit (UDU) ordinance, which legalizes unpermitted units instead of removing them provided that the units meet health and safety codes. In addition to ADU and UDU ordinances, some jurisdictions have also adopted density bonuses, which allow a project to exceed existing density standards if it meets certain affordability requirements. Some responses in the survey indicate that the establishment of some of these tools and standards have reduced community opposition to projects. In addition, some jurisdictions responded that they have reduced review times for residential permit approvals and reduced or waived fees associated with affordable housing development.

To combat gentrification and displacement, some jurisdictions have established rent-stabilization ordinances while others have established a rent registry so that the jurisdiction can monitor rents

and landlord practices. Some jurisdictions have adopted relocation plans and others are actively seeking to extend affordability covenants for those that are expiring.

In regard to funding, SCAG jurisdictions provide a wide variety of support to increase the supply of affordable housing and increase access to fair housing. A number of jurisdictions provide citywide rental assistance programs for low income households and some indicated that their programs include favorable home purchasing options. Some of these programs also encourage developers to utilize the local first-time homebuyer assistance program to specifically qualify lower income applicants.

Other jurisdictions indicate that they manage housing improvement programs to ensure that their existing affordable housing stock is well maintained. Some AFFH surveys describe local multiple rental assistance programs, including Section 8 Housing Choice vouchers and financial support of tenant/landlord arbitration or mediation services.

Some jurisdictions indicated that they have focused on mobile homes as a way to increase access to fair housing. There are programs described that assist households that live in dilapidated and unsafe mobile homes in unpermitted mobile home parks by allowing the household to trade in their mobile home in exchange for a new one in a permitted mobile park. Other programs include rental assistance specifically for households who live in mobile homes.

In regard to community outreach, a large number of jurisdictions in the SCAG region have established or are seeking to establish innovative partnerships to increase access to fair housing and reduce existing barriers. Many jurisdictions work with fair housing advocacy groups such as the Housing Rights Center, which provide community workshops, counseling, and tenant-landlord mediation services. Other jurisdictions have established landlord-tenant commissions to resolve housing disputes and provide services to individuals with limited resources. Some jurisdictions have partnered with advocacy groups, such as the League of United Latin American Citizens (LULAC), to hold community-based workshops featuring simultaneous multi-lingual translations. Other innovative partnerships created by jurisdictions include those with local schools and school districts and public health institutions to engage disadvantaged groups and provide services to areas with limited resources.

A large number of jurisdictions have also indicated that they have increased their social media presence to reach more communities. Others have also increased their multi-lingual outreach efforts to ensure that limited-English proficiency populations have the opportunity to engage in local fair housing efforts.

Based on the AFFH surveys submitted by jurisdictions, while there is a wide range of barriers to fair housing opportunities in the SCAG region there is also a wide range of strategies to help overcome these barriers at the local level.

Meeting AFFH Objectives on a Regional Basis

To work towards the objective of AFFH, several benchmarks were reviewed as potential indicators of increasing access to fair housing and removing barriers that led to historical segregation patterns.

*Opportunity Indices*

The objectives of affirmatively furthering fair housing are to not only overcome patterns of segregation, but to also increase access to opportunity for historically marginalized groups, particularly in racially and ethnically concentrated areas of poverty. In 2015 the U.S. Department of Housing and Urban Development (HUD) developed a set of indices, known as “Opportunity Indices” to help states and jurisdictions identify factors that contribute to fair housing issues in their region and comply with the federal Fair Housing Act.

In 2015 the U.S. Department of Housing and Urban Development (HUD) developed a set of indices, known as “Opportunity Indices” to help states and jurisdictions identify factors that contribute to fair housing issues in their region and comply with the federal Fair Housing Act. In late 2017, a Task Force convened by HCD and the California Tax Credit Allocation Committee (TCAC) released an “Opportunity mapping” tool based on these HUD indices to identify areas in California that can “offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health.”

The TCAC and HCD Opportunity mapping tool includes a total of eleven (11) census-tract level indices to measure exposure to opportunity in local communities. Regional patterns of segregation can be identified based on this tool. The indices are based on indicators such as poverty levels, low wage job proximity, pollution, math and reading proficiency. Below is a summary table of the 11 indices sorted by type:

| <b>Economic</b>        | <b>Environment</b>               | <b>Education</b>             |
|------------------------|----------------------------------|------------------------------|
| Poverty                | CalEnviroScreen 3.0 indicators   | Math proficiency             |
| Adult education        | ) Ozone                          | Reading proficiency          |
| Employment             | ) PM2.5                          | High school graduation rates |
| Low-wage job proximity | ) Diesel PM                      | Student poverty rate         |
| Median home value      | ) Drinking water contaminates    |                              |
|                        | ) Pesticides                     |                              |
|                        | ) Toxic releases from facilities |                              |
|                        | ) Traffic density                |                              |
|                        | ) Cleanup sites                  |                              |
|                        | ) Groundwater threats            |                              |
|                        | ) Hazardous waste                |                              |
|                        | ) Impaired water bodies          |                              |
|                        | ) Solid waste sites              |                              |

To further the objectives of AFFH, SCAG utilizes the Opportunity indices tool at multiple points in the RHNA methodology. Jurisdictions that have the highest concentration of population in low resource areas are exempted from receiving regional residual existing need, which will result in fewer units

assigned to areas identified as having high rates of poverty and racial segregation. Additionally, jurisdictions with the highest concentration of population within highest resource areas will receive a higher social equity adjustment, which will result in more access to opportunity for lower income households.

**Public Engagement**

The development of a comprehensive RHNA methodology requires comprehensive public engagement. Government Code Section 65584.04(d) requires at least one public hearing to receive oral and written comments on the proposed methodology, and also requires SCAG to distribute the proposed methodology to all jurisdictions and requesting stakeholders, along with publishing the proposed methodology on the SCAG website. The official public comment period on the proposed RHNA methodology began on August 1, 2019 after Regional Council action and concluded on September 13, 2019.

To maximize public engagement opportunities, SCAG staff hosted four public workshops to receive verbal and written comment on the proposed RHNA methodology and an additional public information session in August 2019:

- ) August 15, 6-8 p.m. Public Workshop, Los Angeles (View-only webcasting available)
- ) August 20, 1-3 p.m. Public Workshop, Los Angeles (Videoconference at SCAG regional offices and View-only webcasting available)
- ) August 22, 1-3 p.m., Public Workshop, Irvine
- ) August 27, 6-8 p.m., Public Workshop, San Bernardino (View-only webcasting available)
- ) August 29, 1-3pm Public Information Session, Santa Clarita

Approximately 250 people attended the workshops in-person, at videoconference locations, or via webcast. Over 35 individual verbal comments were shared over the four workshops.

To increase participation from individuals and stakeholders that are unable to participate during regular working hours, two of the public workshops were held in the evening hours. One of the workshops was held in the Inland Empire. SCAG will worked with its Environmental Justice Working Group (EJWG) and local stakeholder groups to reach out to their respective contacts in order to maximize outreach to groups representing low income, minority, and other traditionally disadvantaged populations.

Almost 250 written comments were submitted by the comment deadline and included a wide range of stakeholders. Approximately 50 percent were from local jurisdictions and subregions, and the other 50 percent were submitted by advocacy organizations, industry groups, residents and resident groups, and the general public. All of the comments received, both verbal and written, were reviewed by SCAG staff, and were used as the basis for developing the RHNA methodology.

The increased involvement by the number of jurisdictions and stakeholders beyond the municipal level compared to prior RHNA cycles indicate an increased level of interest by the public in the housing crisis and its solutions, and the efforts of SCAG to meet these interests. As part of its housing

program initiatives, SCAG will continue to reach out to not only jurisdictions, but to advocacy groups and traditionally disadvantaged communities that have not historically participated in the RHNA process and regional housing planning. These efforts will be expanded beyond the RHNA program and will be encompassed into addressing the housing crisis at the regional level and ensuring that those at the local and community level can be part of solutions to the housing crisis.

**Additional RHNA Methodology Supporting Materials**

Please note that additional supporting materials for the RHNA Methodology have been posted on SCAG’s RHNA website at [www.scag.ca.gov/rhna](http://www.scag.ca.gov/rhna) including Data Appendix, Local Planning Factor Survey Responses and Affirmatively Furthering Fair Housing Survey Responses.

**State of California**

**GOVERNMENT CODE**

**Section 65080**

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65080. (a) Each transportation planning agency designated under Section 29532 or 29532.1 shall prepare and adopt a regional transportation plan directed at achieving a coordinated and balanced regional transportation system, including, but not limited to, mass transportation, highway, railroad, maritime, bicycle, pedestrian, goods movement, and aviation facilities and services. The plan shall be action-oriented and pragmatic, considering both the short-term and long-term future, and shall present clear, concise policy guidance to local and state officials. The regional transportation plan shall consider factors specified in Section 134 of Title 23 of the United States Code. Each transportation planning agency shall consider and incorporate, as appropriate, the transportation plans of cities, counties, districts, private organizations, and state and federal agencies.

(b) The regional transportation plan shall be an internally consistent document and shall include all of the following:

(1) A policy element that describes the transportation issues in the region, identifies and quantifies regional needs, and describes the desired short-range and long-range transportation goals, and pragmatic objective and policy statements. The objective and policy statements shall be consistent with the funding estimates of the financial element. The policy element of transportation planning agencies with populations that exceed 200,000 persons may quantify a set of indicators including, but not limited to, all of the following:

(A) Measures of mobility and traffic congestion, including, but not limited to, daily vehicle hours of delay per capita and vehicle miles traveled per capita.

(B) Measures of road and bridge maintenance and rehabilitation needs, including, but not limited to, roadway pavement and bridge conditions.

(C) Measures of means of travel, including, but not limited to, percentage share of all trips (work and nonwork) made by all of the following:

(i) Single occupant vehicle.

(ii) Multiple occupant vehicle or carpool.

(iii) Public transit including commuter rail and intercity rail.

(iv) Walking.

(v) Bicycling.

(D) Measures of safety and security, including, but not limited to, total injuries and fatalities assigned to each of the modes set forth in subparagraph (C).

(E) Measures of equity and accessibility, including, but not limited to, percentage of the population served by frequent and reliable public transit, with a breakdown by



income bracket, and percentage of all jobs accessible by frequent and reliable public transit service, with a breakdown by income bracket.

(F) The requirements of this section may be met using existing sources of information. No additional traffic counts, household surveys, or other sources of data shall be required.

(2) A sustainable communities strategy prepared by each metropolitan planning organization as follows:

(A) No later than September 30, 2010, the State Air Resources Board shall provide each affected region with greenhouse gas emission reduction targets for the automobile and light truck sector for 2020 and 2035, respectively.

(i) No later than January 31, 2009, the state board shall appoint a Regional Targets Advisory Committee to recommend factors to be considered and methodologies to be used for setting greenhouse gas emission reduction targets for the affected regions. The committee shall be composed of representatives of the metropolitan planning organizations, affected air districts, the League of California Cities, the California State Association of Counties, local transportation agencies, and members of the public, including homebuilders, environmental organizations, planning organizations, environmental justice organizations, affordable housing organizations, and others. The advisory committee shall transmit a report with its recommendations to the state board no later than September 30, 2009. In recommending factors to be considered and methodologies to be used, the advisory committee may consider any relevant issues, including, but not limited to, data needs, modeling techniques, growth forecasts, the impacts of regional jobs-housing balance on interregional travel and greenhouse gas emissions, economic and demographic trends, the magnitude of greenhouse gas reduction benefits from a variety of land use and transportation strategies, and appropriate methods to describe regional targets and to monitor performance in attaining those targets. The state board shall consider the report before setting the targets.

(ii) Before setting the targets for a region, the state board shall exchange technical information with the metropolitan planning organization and the affected air district. The metropolitan planning organization may recommend a target for the region. The metropolitan planning organization shall hold at least one public workshop within the region after receipt of the report from the advisory committee. The state board shall release draft targets for each region no later than June 30, 2010.

(iii) In establishing these targets, the state board shall take into account greenhouse gas emission reductions that will be achieved by improved vehicle emission standards, changes in fuel composition, and other measures it has approved that will reduce greenhouse gas emissions in the affected regions, and prospective measures the state board plans to adopt to reduce greenhouse gas emissions from other greenhouse gas emission sources as that term is defined in subdivision (i) of Section 38505 of the Health and Safety Code and consistent with the regulations promulgated pursuant to the California Global Warming Solutions Act of 2006 (Division 25.5 (commencing with Section 38500) of the Health and Safety Code), including Section 38566 of the Health and Safety Code.

(iv) The state board shall update the regional greenhouse gas emission reduction targets every eight years consistent with each metropolitan planning organization's timeframe for updating its regional transportation plan under federal law until 2050. The state board may revise the targets every four years based on changes in the factors considered under clause (iii). The state board shall exchange technical information with the Department of Transportation, metropolitan planning organizations, local governments, and affected air districts and engage in a consultative process with public and private stakeholders, before updating these targets.

(v) The greenhouse gas emission reduction targets may be expressed in gross tons, tons per capita, tons per household, or in any other metric deemed appropriate by the state board.

(B) Each metropolitan planning organization shall prepare a sustainable communities strategy, subject to the requirements of Part 450 of Title 23 of, and Part 93 of Title 40 of, the Code of Federal Regulations, including the requirement to use the most recent planning assumptions considering local general plans and other factors. The sustainable communities strategy shall (i) identify the general location of uses, residential densities, and building intensities within the region, (ii) identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth, (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Section 65584, (iv) identify a transportation network to service the transportation needs of the region, (v) gather and consider the best practically available scientific information regarding resource areas and farmland in the region as defined in subdivisions (a) and (b) of Section 65080.01, (vi) consider the state housing goals specified in Sections 65580 and 65581, (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board, and (viii) allow the regional transportation plan to comply with Section 176 of the federal Clean Air Act (42 U.S.C. Sec. 7506).

(C) (i) Within the jurisdiction of the Metropolitan Transportation Commission, as defined by Section 66502, the Association of Bay Area Governments shall be responsible for clauses (i), (ii), (iii), (v), and (vi) of subparagraph (B); the Metropolitan Transportation Commission shall be responsible for clauses (iv) and (viii) of subparagraph (B); and the Association of Bay Area Governments and the Metropolitan Transportation Commission shall jointly be responsible for clause (vii) of subparagraph (B).

(ii) Within the jurisdiction of the Tahoe Regional Planning Agency, as defined in Sections 66800 and 66801, the Tahoe Metropolitan Planning Organization shall use the Regional Plan for the Lake Tahoe Region as the sustainable community strategy, provided that it complies with clauses (vii) and (viii) of subparagraph (B).

(D) In the region served by the Southern California Association of Governments, a subregional council of governments and the county transportation commission may work together to propose the sustainable communities strategy and an alternative planning strategy, if one is prepared pursuant to subparagraph (I), for that subregional area. The metropolitan planning organization may adopt a framework for a subregional sustainable communities strategy or a subregional alternative planning strategy to address the intraregional land use, transportation, economic, air quality, and climate policy relationships. The metropolitan planning organization shall include the subregional sustainable communities strategy for that subregion in the regional sustainable communities strategy to the extent consistent with this section and federal law and approve the subregional alternative planning strategy, if one is prepared pursuant to subparagraph (I), for that subregional area to the extent consistent with this section. The metropolitan planning organization shall develop overall guidelines, create public participation plans pursuant to subparagraph (F), ensure coordination, resolve conflicts, make sure that the overall plan complies with applicable legal requirements, and adopt the plan for the region.

(E) The metropolitan planning organization shall conduct at least two informational meetings in each county within the region for members of the board of supervisors and city councils on the sustainable communities strategy and alternative planning strategy, if any. The metropolitan planning organization may conduct only one informational meeting if it is attended by representatives of the county board of supervisors and city council members representing a majority of the cities representing a majority of the population in the incorporated areas of that county. Notice of the meeting or meetings shall be sent to the clerk of the board of supervisors and to each city clerk. The purpose of the meeting or meetings shall be to discuss the sustainable communities strategy and the alternative planning strategy, if any, including the key land use and planning assumptions to the members of the board of supervisors and the city council members in that county and to solicit and consider their input and recommendations.

(F) Each metropolitan planning organization shall adopt a public participation plan, for development of the sustainable communities strategy and an alternative planning strategy, if any, that includes all of the following:

(i) Outreach efforts to encourage the active participation of a broad range of stakeholder groups in the planning process, consistent with the agency's adopted Federal Public Participation Plan, including, but not limited to, affordable housing advocates, transportation advocates, neighborhood and community groups, environmental advocates, home builder representatives, broad-based business organizations, landowners, commercial property interests, and homeowner associations.

(ii) Consultation with congestion management agencies, transportation agencies, and transportation commissions.

(iii) Workshops throughout the region to provide the public with the information and tools necessary to provide a clear understanding of the issues and policy choices. At least one workshop shall be held in each county in the region. For counties with a population greater than 500,000, at least three workshops shall be held. Each

workshop, to the extent practicable, shall include urban simulation computer modeling to create visual representations of the sustainable communities strategy and the alternative planning strategy.

(iv) Preparation and circulation of a draft sustainable communities strategy and an alternative planning strategy, if one is prepared, not less than 55 days before adoption of a final regional transportation plan.

(v) At least three public hearings on the draft sustainable communities strategy in the regional transportation plan and alternative planning strategy, if one is prepared. If the metropolitan transportation organization consists of a single county, at least two public hearings shall be held. To the maximum extent feasible, the hearings shall be in different parts of the region to maximize the opportunity for participation by members of the public throughout the region.

(vi) A process for enabling members of the public to provide a single request to receive notices, information, and updates.

(G) In preparing a sustainable communities strategy, the metropolitan planning organization shall consider spheres of influence that have been adopted by the local agency formation commissions within its region.

(H) Before adopting a sustainable communities strategy, the metropolitan planning organization shall quantify the reduction in greenhouse gas emissions projected to be achieved by the sustainable communities strategy and set forth the difference, if any, between the amount of that reduction and the target for the region established by the state board.

(I) If the sustainable communities strategy, prepared in compliance with subparagraph (B) or (D), is unable to reduce greenhouse gas emissions to achieve the greenhouse gas emission reduction targets established by the state board, the metropolitan planning organization shall prepare an alternative planning strategy to the sustainable communities strategy showing how those greenhouse gas emission targets would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies. The alternative planning strategy shall be a separate document from the regional transportation plan, but it may be adopted concurrently with the regional transportation plan. In preparing the alternative planning strategy, the metropolitan planning organization:

(i) Shall identify the principal impediments to achieving the targets within the sustainable communities strategy.

(ii) May include an alternative development pattern for the region pursuant to subparagraphs (B) to (G), inclusive.

(iii) Shall describe how the greenhouse gas emission reduction targets would be achieved by the alternative planning strategy, and why the development pattern, measures, and policies in the alternative planning strategy are the most practicable choices for achievement of the greenhouse gas emission reduction targets.

(iv) An alternative development pattern set forth in the alternative planning strategy shall comply with Part 450 of Title 23 of, and Part 93 of Title 40 of, the Code of Federal Regulations, except to the extent that compliance will prevent achievement of the greenhouse gas emission reduction targets approved by the state board.

(v) For purposes of the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code), an alternative planning strategy shall not constitute a land use plan, policy, or regulation, and the inconsistency of a project with an alternative planning strategy shall not be a consideration in determining whether a project may have an environmental effect.

(J) (i) Before starting the public participation process adopted pursuant to subparagraph (F), the metropolitan planning organization shall submit a description to the state board of the technical methodology it intends to use to estimate the greenhouse gas emissions from its sustainable communities strategy and, if appropriate, its alternative planning strategy. The state board shall respond to the metropolitan planning organization in a timely manner with written comments about the technical methodology, including specifically describing any aspects of that methodology it concludes will not yield accurate estimates of greenhouse gas emissions, and suggested remedies. The metropolitan planning organization is encouraged to work with the state board until the state board concludes that the technical methodology operates accurately.

(ii) After adoption, a metropolitan planning organization shall submit a sustainable communities strategy or an alternative planning strategy, if one has been adopted, to the state board for review, including the quantification of the greenhouse gas emission reductions the strategy would achieve and a description of the technical methodology used to obtain that result. Review by the state board shall be limited to acceptance or rejection of the metropolitan planning organization's determination that the strategy submitted would, if implemented, achieve the greenhouse gas emission reduction targets established by the state board. The state board shall complete its review within 60 days.

(iii) If the state board determines that the strategy submitted would not, if implemented, achieve the greenhouse gas emission reduction targets, the metropolitan planning organization shall revise its strategy or adopt an alternative planning strategy, if not previously adopted, and submit the strategy for review pursuant to clause (ii). At a minimum, the metropolitan planning organization must obtain state board acceptance that an alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets established for that region by the state board.

(iv) On or before September 1, 2018, and every four years thereafter to align with target setting, notwithstanding Section 10231.5, the state board shall prepare a report that assesses progress made by each metropolitan planning organization in meeting the regional greenhouse gas emission reduction targets set by the state board. The report shall include changes to greenhouse gas emissions in each region and data-supported metrics for the strategies used to meet the targets. The report shall also include a discussion of best practices and the challenges faced by the metropolitan planning organizations in meeting the targets, including the effect of state policies and funding. The report shall be developed in consultation with the metropolitan planning organizations and affected stakeholders. The report shall be submitted to the Assembly Committee on Transportation and the Assembly Committee on Natural

Resources, and to the Senate Committee on Transportation, the Senate Committee on Housing, and the Senate Committee on Environmental Quality.

(K) Neither a sustainable communities strategy nor an alternative planning strategy regulates the use of land, nor, except as provided by subparagraph (J), shall either one be subject to any state approval. Nothing in a sustainable communities strategy shall be interpreted as superseding the exercise of the land use authority of cities and counties within the region. Nothing in this section shall be interpreted to limit the state board's authority under any other law. Nothing in this section shall be interpreted to authorize the abrogation of any vested right whether created by statute or by common law. Nothing in this section shall require a city's or county's land use policies and regulations, including its general plan, to be consistent with the regional transportation plan or an alternative planning strategy. Nothing in this section requires a metropolitan planning organization to approve a sustainable communities strategy that would be inconsistent with Part 450 of Title 23 of, or Part 93 of Title 40 of, the Code of Federal Regulations and any administrative guidance under those regulations. Nothing in this section relieves a public or private entity or any person from compliance with any other local, state, or federal law.

(L) Nothing in this section requires projects programmed for funding on or before December 31, 2011, to be subject to the provisions of this paragraph if they (i) are contained in the 2007 or 2009 Federal Statewide Transportation Improvement Program, (ii) are funded pursuant to the Highway Safety, Traffic Reduction, Air Quality, and Port Security Bond Act of 2006 (Chapter 12.49 (commencing with Section 8879.20) of Division 1 of Title 2), or (iii) were specifically listed in a ballot measure before December 31, 2008, approving a sales tax increase for transportation projects. Nothing in this section shall require a transportation sales tax authority to change the funding allocations approved by the voters for categories of transportation projects in a sales tax measure adopted before December 31, 2010. For purposes of this subparagraph, a transportation sales tax authority is a district, as defined in Section 7252 of the Revenue and Taxation Code, that is authorized to impose a sales tax for transportation purposes.

(M) A metropolitan planning organization, or a regional transportation planning agency not within a metropolitan planning organization, that is required to adopt a regional transportation plan not less than every five years, may elect to adopt the plan not less than every four years. This election shall be made by the board of directors of the metropolitan planning organization or regional transportation planning agency no later than June 1, 2009, or thereafter 54 months before the statutory deadline for the adoption of housing elements for the local jurisdictions within the region, after a public hearing at which comments are accepted from members of the public and representatives of cities and counties within the region covered by the metropolitan planning organization or regional transportation planning agency. Notice of the public hearing shall be given to the general public and by mail to cities and counties within the region no later than 30 days before the date of the public hearing. Notice of election shall be promptly given to the Department of Housing and Community Development. The metropolitan planning organization or the regional transportation planning agency

shall complete its next regional transportation plan within three years of the notice of election.

(N) Two or more of the metropolitan planning organizations for Fresno County, Kern County, Kings County, Madera County, Merced County, San Joaquin County, Stanislaus County, and Tulare County may work together to develop and adopt multiregional goals and policies that may address interregional land use, transportation, economic, air quality, and climate relationships. The participating metropolitan planning organizations may also develop a multiregional sustainable communities strategy, to the extent consistent with federal law, or an alternative planning strategy for adoption by the metropolitan planning organizations. Each participating metropolitan planning organization shall consider any adopted multiregional goals and policies in the development of a sustainable communities strategy and, if applicable, an alternative planning strategy for its region.

(3) An action element that describes the programs and actions necessary to implement the plan and assigns implementation responsibilities. The action element may describe all transportation projects proposed for development during the 20-year or greater life of the plan. The action element shall consider congestion management programming activities carried out within the region.

(4) (A) A financial element that summarizes the cost of plan implementation constrained by a realistic projection of available revenues. The financial element shall also contain recommendations for allocation of funds. A county transportation commission created pursuant to the County Transportation Commissions Act (Division 12 (commencing with Section 130000) of the Public Utilities Code) shall be responsible for recommending projects to be funded with regional improvement funds, if the project is consistent with the regional transportation plan. The first five years of the financial element shall be based on the five-year estimate of funds developed pursuant to Section 14524. The financial element may recommend the development of specified new sources of revenue, consistent with the policy element and action element.

(B) The financial element of transportation planning agencies with populations that exceed 200,000 persons may include a project cost breakdown for all projects proposed for development during the 20-year life of the plan that includes total expenditures and related percentages of total expenditures for all of the following:

- (i) State highway expansion.
- (ii) State highway rehabilitation, maintenance, and operations.
- (iii) Local road and street expansion.
- (iv) Local road and street rehabilitation, maintenance, and operation.
- (v) Mass transit, commuter rail, and intercity rail expansion.
- (vi) Mass transit, commuter rail, and intercity rail rehabilitation, maintenance, and operations.
- (vii) Pedestrian and bicycle facilities.
- (viii) Environmental enhancements and mitigation.
- (ix) Research and planning.
- (x) Other categories.

(C) The metropolitan planning organization or county transportation agency, whichever entity is appropriate, shall consider financial incentives for cities and counties that have resource areas or farmland, as defined in Section 65080.01, for the purposes of, for example, transportation investments for the preservation and safety of the city street or county road system and farm-to-market and interconnectivity transportation needs. The metropolitan planning organization or county transportation agency, whichever entity is appropriate, shall also consider financial assistance for counties to address countywide service responsibilities in counties that contribute toward the greenhouse gas emission reduction targets by implementing policies for growth to occur within their cities.

(c) Each transportation planning agency may also include other factors of local significance as an element of the regional transportation plan, including, but not limited to, issues of mobility for specific sectors of the community, including, but not limited to, senior citizens.

(d) (1) Except as otherwise provided in this subdivision, each transportation planning agency shall adopt and submit, every four years, an updated regional transportation plan to the California Transportation Commission and the Department of Transportation. A transportation planning agency located in a federally designated air quality attainment area or that does not contain an urbanized area may at its option adopt and submit a regional transportation plan every five years. When applicable, the plan shall be consistent with federal planning and programming requirements and shall conform to the regional transportation plan guidelines adopted by the California Transportation Commission. Before adoption of the regional transportation plan, a public hearing shall be held after the giving of notice of the hearing by publication in the affected county or counties pursuant to Section 6061.

(2) (A) Notwithstanding subdivisions (b) and (c), and paragraph (1), inclusive, the regional transportation plan, sustainable communities strategy, and environmental impact report adopted by the San Diego Association of Governments on October 9, 2015, shall remain in effect for all purposes, including for purposes of consistency determinations and funding eligibility for the San Diego Association of Governments and all other agencies relying on those documents, until the San Diego Association of Governments adopts its next update to its regional transportation plan.

(B) The San Diego Association of Governments shall adopt and submit its update to the 2015 regional transportation plan on or before December 31, 2021.

(C) After the update described in subparagraph (B), the time period for San Diego Association of Governments' updates to its regional transportation plan shall be reset and shall be adopted and submitted every four years.

(D) Notwithstanding clause (iv) of subparagraph (A) of paragraph (2) of subdivision (b), the State Air Resources Board shall not update the greenhouse gas emission reduction targets for the region within the jurisdiction of the San Diego Association of Governments before the adoption of the update to the regional transportation plan pursuant to subparagraph (B).

(E) The update to the regional transportation plan adopted by the San Diego Association of Governments on October 9, 2015, which will be prepared and submitted



to federal agencies for purposes of compliance with federal laws applicable to regional transportation plans and air quality conformity and which is due in October 2019, shall not be considered a regional transportation plan pursuant to this section and shall not constitute a project for purposes of the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code).

(F) In addition to meeting the other requirements to nominate a project for funding through the Solutions for Congested Corridors Program (Chapter 8.5 (commencing with Section 2390) of Division 3 of the Streets and Highways Code), the San Diego Association of Governments, until December 31, 2021, shall only nominate projects for funding through the Solutions for Congested Corridors Program that are consistent with the eligibility requirements for projects under any of the following programs:

(i) The Transit and Intercity Rail Capital Program (Part 2 (commencing with Section 75220) of Division 44 of the Public Resources Code).

(ii) The Low Carbon Transit Operations Program (Part 3 (commencing with Section 75230) of Division 44 of the Public Resources Code).

(iii) The Active Transportation Program (Chapter 8 (commencing with Section 2380) of Division 3 of the Streets and Highways Code).

(G) Commencing January 1, 2020, and every two years thereafter, the San Diego Association of Governments shall begin developing an implementation report that tracks the implementation of its most recently adopted sustainable communities strategy. The report shall discuss the status of the implementation of the strategy at the regional and local level, and any successes and barriers that have occurred since the last report. The San Diego Association of Governments shall submit the implementation report to the state board by including it in its sustainable communities strategy implementation review pursuant to clause (ii) of subparagraph (J) of paragraph (2) of subdivision (b).

(Amended by Stats. 2019, Ch. 634, Sec. 2. (AB 1730) Effective January 1, 2020.)

**State of California**

**GOVERNMENT CODE**

**Section 65584**

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65584. (a) (1) For the fourth and subsequent revisions of the housing element pursuant to Section 65588, the department shall determine the existing and projected need for housing for each region pursuant to this article. For purposes of subdivision (a) of Section 65583, the share of a city or county of the regional housing need shall include that share of the housing need of persons at all income levels within the area significantly affected by the general plan of the city or county.

(2) It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes. These actions shall include applicable reforms and incentives in Section 65582.1.

(3) The Legislature finds and declares that insufficient housing in job centers hinders the state’s environmental quality and runs counter to the state’s environmental goals. In particular, when Californians seeking affordable housing are forced to drive longer distances to work, an increased amount of greenhouse gases and other pollutants is released and puts in jeopardy the achievement of the state’s climate goals, as established pursuant to Section 38566 of the Health and Safety Code, and clean air goals.

(b) The department, in consultation with each council of governments, shall determine each region’s existing and projected housing need pursuant to Section 65584.01 at least two years prior to the scheduled revision required pursuant to Section 65588. The appropriate council of governments, or for cities and counties without a council of governments, the department, shall adopt a final regional housing need plan that allocates a share of the regional housing need to each city, county, or city and county at least one year prior to the scheduled revision for the region required by Section 65588. The allocation plan prepared by a council of governments shall be prepared pursuant to Sections 65584.04 and 65584.05.

(c) Notwithstanding any other provision of law, the due dates for the determinations of the department or for the council of governments, respectively, regarding the regional housing need may be extended by the department by not more than 60 days if the extension will enable access to more recent critical population or housing data from a pending or recent release of the United States Census Bureau or the Department of Finance. If the due date for the determination of the department or the council of governments is extended for this reason, the department shall extend the corresponding

housing element revision deadline pursuant to Section 65588 by not more than 60 days.

(d) The regional housing needs allocation plan shall further all of the following objectives:

(1) Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households.

(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.

(3) Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.

(4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.

(5) Affirmatively furthering fair housing.

(e) For purposes of this section, "affirmatively furthering fair housing" means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

(f) For purposes of this section, "household income levels" are as determined by the department as of the most recent American Community Survey pursuant to the following code sections:

(1) Very low incomes as defined by Section 50105 of the Health and Safety Code.

(2) Lower incomes, as defined by Section 50079.5 of the Health and Safety Code.

(3) Moderate incomes, as defined by Section 50093 of the Health and Safety Code.

(4) Above moderate incomes are those exceeding the moderate-income level of Section 50093 of the Health and Safety Code.

(g) Notwithstanding any other provision of law, determinations made by the department, a council of governments, or a city or county pursuant to this section or Section 65584.01, 65584.02, 65584.03, 65584.04, 65584.05, 65584.06, 65584.07, or

65584.08 are exempt from the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code).

(Amended by Stats. 2018, Ch. 989, Sec. 1.5. (AB 1771) Effective January 1, 2019.)

**State of California**

**GOVERNMENT CODE**

**Section 65584.04**

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65584.04. (a) At least two years before a scheduled revision required by Section 65588, each council of governments, or delegate subregion as applicable, shall develop, in consultation with the department, a proposed methodology for distributing the existing and projected regional housing need to cities, counties, and cities and counties within the region or within the subregion, where applicable pursuant to this section. The methodology shall further the objectives listed in subdivision (d) of Section 65584.

(b) (1) No more than six months before the development of a proposed methodology for distributing the existing and projected housing need, each council of governments shall survey each of its member jurisdictions to request, at a minimum, information regarding the factors listed in subdivision (e) that will allow the development of a methodology based upon the factors established in subdivision (e).

(2) With respect to the objective in paragraph (5) of subdivision (d) of Section 65584, the survey shall review and compile information that will allow the development of a methodology based upon the issues, strategies, and actions that are included, as available, in an Analysis of Impediments to Fair Housing Choice or an Assessment of Fair Housing completed by any city or county or the department that covers communities within the area served by the council of governments, and in housing elements adopted pursuant to this article by cities and counties within the area served by the council of governments.

(3) The council of governments shall seek to obtain the information in a manner and format that is comparable throughout the region and utilize readily available data to the extent possible.

(4) The information provided by a local government pursuant to this section shall be used, to the extent possible, by the council of governments, or delegate subregion as applicable, as source information for the methodology developed pursuant to this section. The survey shall state that none of the information received may be used as a basis for reducing the total housing need established for the region pursuant to Section 65584.01.

(5) If the council of governments fails to conduct a survey pursuant to this subdivision, a city, county, or city and county may submit information related to the items listed in subdivision (e) before the public comment period provided for in subdivision (d).

(c) The council of governments shall electronically report the results of the survey of fair housing issues, strategies, and actions compiled pursuant to paragraph (2) of subdivision (b). The report shall describe common themes and effective strategies

employed by cities and counties within the area served by the council of governments, including common themes and effective strategies around avoiding the displacement of lower income households. The council of governments shall also identify significant barriers to affirmatively furthering fair housing at the regional level and may recommend strategies or actions to overcome those barriers. A council of governments or metropolitan planning organization, as appropriate, may use this information for any other purpose, including publication within a regional transportation plan adopted pursuant to Section 65080 or to inform the land use assumptions that are applied in the development of a regional transportation plan.

(d) Public participation and access shall be required in the development of the methodology and in the process of drafting and adoption of the allocation of the regional housing needs. Participation by organizations other than local jurisdictions and councils of governments shall be solicited in a diligent effort to achieve public participation of all economic segments of the community as well as members of protected classes under Section 12955. The proposed methodology, along with any relevant underlying data and assumptions, an explanation of how information about local government conditions gathered pursuant to subdivision (b) has been used to develop the proposed methodology, how each of the factors listed in subdivision (e) is incorporated into the methodology, and how the proposed methodology furthers the objectives listed in subdivision (e) of Section 65584, shall be distributed to all cities, counties, any subregions, and members of the public who have made a written or electronic request for the proposed methodology and published on the council of governments', or delegate subregion's, internet website. The council of governments, or delegate subregion, as applicable, shall conduct at least one public hearing to receive oral and written comments on the proposed methodology.

(e) To the extent that sufficient data is available from local governments pursuant to subdivision (b) or other sources, each council of governments, or delegate subregion as applicable, shall include the following factors to develop the methodology that allocates regional housing needs:

(1) Each member jurisdiction's existing and projected jobs and housing relationship. This shall include an estimate based on readily available data on the number of low-wage jobs within the jurisdiction and how many housing units within the jurisdiction are affordable to low-wage workers as well as an estimate based on readily available data, of projected job growth and projected household growth by income level within each member jurisdiction during the planning period.

(2) The opportunities and constraints to development of additional housing in each member jurisdiction, including all of the following:

(A) Lack of capacity for sewer or water service due to federal or 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.

(B) 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. The council of governments may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality, but shall consider the potential for increased residential development under alternative zoning ordinances and land use restrictions. The determination of available land suitable for urban development may exclude lands where the Federal Emergency Management Agency (FEMA) or the Department of Water Resources has determined that the flood management infrastructure designed to protect that land is not adequate to avoid the risk of flooding.

(C) Lands preserved or protected from urban development under existing federal or state programs, or both, designed to protect open space, farmland, environmental habitats, and natural resources on a long-term basis, including land zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts conversion to nonagricultural uses.

(D) County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts its conversion to nonagricultural uses.

(3) 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.

(4) Agreements between a county and cities in a county to direct growth toward incorporated areas of the county and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of the jurisdiction that prohibits or restricts conversion to nonagricultural uses.

(5) The loss of units contained in assisted housing developments, as defined in paragraph (9) of subdivision (a) of Section 65583, that changed to non-low-income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions.

(6) The percentage of existing households at each of the income levels listed in subdivision (e) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent.

(7) The rate of overcrowding.

(8) The housing needs of farmworkers.

(9) The 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.

(10) The housing needs of individuals and families experiencing homelessness. If a council of governments has surveyed each of its member jurisdictions pursuant to subdivision (b) on or before January 1, 2020, this paragraph shall apply only to the

development of methodologies for the seventh and subsequent revisions of the housing element.

(11) The loss of units during a state of emergency that was declared by the Governor pursuant to the California Emergency Services Act (Chapter 7 (commencing with Section 8550) of Division 1 of Title 2), during the planning period immediately preceding the relevant revision pursuant to Section 65588 that have yet to be rebuilt or replaced at the time of the analysis.

(12) The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080.

(13) Any other factors adopted by the council of governments, that further the objectives listed in subdivision (d) of Section 65584, provided that the council of governments specifies which of the objectives each additional factor is necessary to further. The council of governments may include additional factors unrelated to furthering the objectives listed in subdivision (d) of Section 65584 so long as the additional factors do not undermine the objectives listed in subdivision (d) of Section 65584 and are applied equally across all household income levels as described in subdivision (f) of Section 65584 and the council of governments makes a finding that the factor is necessary to address significant health and safety conditions.

(f) The council of governments, or delegate subregion, as applicable, shall explain in writing how each of the factors described in subdivision (e) was incorporated into the methodology and how the methodology furthers the objectives listed in subdivision (d) of Section 65584. The methodology may include numerical weighting. This information, and any other supporting materials used in determining the methodology, shall be posted on the council of governments', or delegate subregion's, internet website.

(g) The following criteria shall not be a justification for a determination or a reduction in a jurisdiction's share of the regional housing need:

(1) Any ordinance, policy, voter-approved measure, or standard of a city or county that directly or indirectly limits the number of residential building permits issued by a city or county.

(2) Prior underproduction of housing in a city or county from the previous regional housing need allocation, as determined by each jurisdiction's annual production report submitted pursuant to subparagraph (H) of paragraph (2) of subdivision (a) of Section 65400.

(3) Stable population numbers in a city or county from the previous regional housing needs cycle.

(h) Following the conclusion of the public comment period described in subdivision (d) on the proposed allocation methodology, and after making any revisions deemed appropriate by the council of governments, or delegate subregion, as applicable, as a result of comments received during the public comment period, and as a result of consultation with the department, each council of governments, or delegate subregion, as applicable, shall publish a draft allocation methodology on its internet website and submit the draft allocation methodology, along with the information required pursuant to subdivision (e), to the department.



(i) Within 60 days, the department shall review the draft allocation methodology and report its written findings to the council of governments, or delegate subregion, as applicable. In its written findings the department shall determine whether the methodology furthers the objectives listed in subdivision (d) of Section 65584. If the department determines that the methodology is not consistent with subdivision (d) of Section 65584, the council of governments, or delegate subregion, as applicable, shall take one of the following actions:

(1) Revise the methodology to further the objectives listed in subdivision (d) of Section 65584 and adopt a final regional, or subregional, housing need allocation methodology.

(2) Adopt the regional, or subregional, housing need allocation methodology without revisions and include within its resolution of adoption findings, supported by substantial evidence, as to why the council of governments, or delegate subregion, believes that the methodology furthers the objectives listed in subdivision (d) of Section 65584 despite the findings of the department.

(j) If the department's findings are not available within the time limits set by subdivision (i), the council of governments, or delegate subregion, may act without them.

(k) Upon either action pursuant to subdivision (i), the council of governments, or delegate subregion, shall provide notice of the adoption of the methodology to the jurisdictions within the region, or delegate subregion, as applicable, and to the department, and shall publish the adopted allocation methodology, along with its resolution and any adopted written findings, on its internet website.

(l) The department may, within 90 days, review the adopted methodology and report its findings to the council of governments, or delegate subregion.

(m) (1) It is the intent of the Legislature that housing planning be coordinated and integrated with the regional transportation plan. To achieve this goal, the allocation plan shall allocate housing units within the region consistent with the development pattern included in the sustainable communities strategy.

(2) The final allocation plan shall ensure that the total regional housing need, by income category, as determined under Section 65584, is maintained, and that each jurisdiction in the region receive an allocation of units for low- and very low income households.

(3) The resolution approving the final housing need allocation plan shall demonstrate that the plan is consistent with the sustainable communities strategy in the regional transportation plan and furthers the objectives listed in subdivision (d) of Section 65584.

(Amended (as amended by Stats. 2018, Ch. 990, Sec. 3.7) by Stats. 2019, Ch. 335, Sec. 4. (AB 139) Effective January 1, 2020.)

**State of California**

**GOVERNMENT CODE**

**Section 65584.05**

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65584.05. (a) At least one and one-half years before the scheduled revision required by Section 65588, each council of governments and delegate subregion, as applicable, shall distribute a draft allocation of regional housing needs to each local government in the region or subregion, where applicable, and the department, based on the methodology adopted pursuant to Section 65584.04 and shall publish the draft allocation on its internet website. The draft allocation shall include the underlying data and methodology on which the allocation is based, and a statement as to how it furthers the objectives listed in subdivision (d) of Section 65584. It is the intent of the Legislature that the draft allocation should be distributed before the completion of the update of the applicable regional transportation plan. The draft allocation shall distribute to localities and subregions, if any, within the region the entire regional housing need determined pursuant to Section 65584.01 or within subregions, as applicable, the subregion's entire share of the regional housing need determined pursuant to Section 65584.03.

(b) Within 45 days following receipt of the draft allocation, a local government within the region or the delegate subregion, as applicable, or the department may appeal to the council of governments or the delegate subregion for a revision of the share of the regional housing need proposed to be allocated to one or more local governments. Appeals shall be based upon comparable data available for all affected jurisdictions and accepted planning methodology, and supported by adequate documentation, and shall include a statement as to why the revision is necessary to further the intent of the objectives listed in subdivision (d) of Section 65584. An appeal pursuant to this subdivision shall be consistent with, and not to the detriment of, the development pattern in an applicable sustainable communities strategy developed pursuant to paragraph (2) of subdivision (b) of Section 65080. Appeals shall be limited to any of the following circumstances:

(1) The council of governments or delegate subregion, as applicable, failed to adequately consider the information submitted pursuant to subdivision (b) of Section 65584.04.

(2) The council of governments or delegate subregion, as applicable, failed to determine the share of the regional housing need in accordance with the information described in, and the methodology established pursuant to, Section 65584.04, and in a manner that furthers, and does not undermine, the intent of the objectives listed in subdivision (d) of Section 65584.

(3) A significant and unforeseen change in circumstances has occurred in the local jurisdiction or jurisdictions that merits a revision of the information submitted pursuant

to subdivision (b) of Section 65584.04. Appeals on this basis shall only be made by the jurisdiction or jurisdictions where the change in circumstances has occurred.

(c) At the close of the period for filing appeals pursuant to subdivision (b), the council of governments or delegate subregion, as applicable, shall notify all other local governments within the region or delegate subregion and the department of all appeals and shall make all materials submitted in support of each appeal available on a publicly available internet website. Local governments and the department may, within 45 days, comment on one or more appeals. If no appeals are filed, the draft allocation shall be issued as the proposed final allocation plan pursuant to paragraph (2) of subdivision (e).

(d) No later than 30 days after the close of the comment period, and after providing all local governments within the region or delegate subregion, as applicable, at least 21 days prior notice, the council of governments or delegate subregion shall conduct one public hearing to consider all appeals filed pursuant to subdivision (b) and all comments received pursuant to subdivision (c).

(e) No later than 45 days after the public hearing pursuant to subdivision (d), the council of governments or delegate subregion, as applicable, shall do both of the following:

(1) Make a final determination that either accepts, rejects, or modifies each appeal for a revised share filed pursuant to subdivision (b). Final determinations shall be based upon the information and methodology described in Section 65584.04 and whether the revision is necessary to further the objectives listed in subdivision (d) of Section 65584. The final determination shall be in writing and shall include written findings as to how the determination is consistent with this article. The final determination on an appeal may require the council of governments or delegate subregion, as applicable, to adjust the share of the regional housing need allocated to one or more local governments that are not the subject of an appeal.

(2) Issue a proposed final allocation plan.

(f) In the proposed final allocation plan, the council of governments or delegate subregion, as applicable, shall adjust allocations to local governments based upon the results of the appeals process. If the adjustments total 7 percent or less of the regional housing need determined pursuant to Section 65584.01, or, as applicable, total 7 percent or less of the subregion's share of the regional housing need as determined pursuant to Section 65584.03, then the council of governments or delegate subregion, as applicable, shall distribute the adjustments proportionally to all local governments. If the adjustments total more than 7 percent of the regional housing need, then the council of governments or delegate subregion, as applicable, shall develop a methodology to distribute the amount greater than the 7 percent to local governments. The total distribution of housing need shall not equal less than the regional housing need, as determined pursuant to Section 65584.01, nor shall the subregional distribution of housing need equal less than its share of the regional housing need as determined pursuant to Section 65584.03.

(g) Within 45 days after the issuance of the proposed final allocation plan by the council of governments and each delegate subregion, as applicable, the council of

governments shall hold a public hearing to adopt a final allocation plan. To the extent that the final allocation plan fully allocates the regional share of statewide housing need, as determined pursuant to Section 65584.01 and has taken into account all appeals, the council of governments shall have final authority to determine the distribution of the region's existing and projected housing need as determined pursuant to Section 65584.01. The council of governments shall submit its final allocation plan to the department within three days of adoption. Within 30 days after the department's receipt of the final allocation plan adopted by the council of governments, the department shall determine if the final allocation plan is consistent with the existing and projected housing need for the region, as determined pursuant to Section 65584.01. The department may revise the determination of the council of governments if necessary to obtain this consistency.

(h) Any authority of the council of governments to review and revise the share of a city or county of the regional housing need under this section shall not constitute authority to revise, approve, or disapprove the manner in which the share of the city or county of the regional housing need is implemented through its housing program.

(i) Any time period in subdivision (d) or (e) may be extended by a council of governments or delegate subregion, as applicable, for up to 30 days.

(j) The San Diego Association of Governments may follow the process in this section for the draft and final allocation plan for the sixth revision of the housing element notwithstanding such actions being carried out before the adoption of an updated regional transportation plan and sustainable communities strategy.

(Amended by Stats. 2019, Ch. 634, Sec. 4. (AB 1730) Effective January 1, 2020.)

## RHNA SUBCOMMITTEE CHARTER – 6<sup>th</sup> Cycle

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### **Purpose of the Subcommittee**

The purpose of the RHNA Subcommittee is to review in-depth the various policy considerations necessary to the development of SCAG's Regional Housing Needs Assessment (RHNA), and to make critical decisions throughout the RHNA process, including but not limited to the following: the RHNA methodology, the draft and final RHNA allocations, and appeals related to draft RHNA allocations. The decisions of the RHNA Subcommittee will serve as recommendations to SCAG's Community, Economic and Human Development (CEHD) Committee and the Regional Council, except that the RHNA Subcommittee will make the final decisions regarding all appeals of draft RHNA allocations.

### **Authority**

Authorized by the Regional Council, the RHNA Subcommittee serves as a subcommittee of the CEHD Committee, and will be reporting to the CEHD Committee. All actions by the RHNA Subcommittee, except for actions pertaining to appeals of draft RHNA allocations, are subject to the review and approval of the CEHD Committee and the Regional Council. Recognizing the significant amount of work undertaken by the RHNA Subcommittee, the CEHD Committee and the Regional Council will rely on the policy judgments of the RHNA Subcommittee. The RHNA Subcommittee shall be dissolved as of the date in which the final RHNA allocation is adopted by the Regional Council.

### **Composition**

The RHNA Subcommittee will consist of twelve (12) members of the Regional Council or the CEHD Committee to represent the six (6) counties of the SCAG region. Each county shall have a primary member and an alternate member to serve on the RHNA Subcommittee. The SCAG President will appoint the members of the RHNA Subcommittee and will select one of the members to serve as the Chair of the RHNA Subcommittee. Membership of the RHNA Subcommittee may also include as non-voting members serving as stakeholder representatives appointed by the SCAG President.

### **Meetings and Voting**

The meetings of the RHNA Subcommittee will occur during the applicable period when SCAG is developing the RHNA. The RHNA Subcommittee shall have the authority to convene meetings as circumstances require. A meeting quorum shall be established when there is attendance by at least one representative (either a primary member or an alternate member) from each of the six (6) counties. Stakeholder representatives serving as non-voting members of the RHNA Subcommittee are not counted for purposes of establishing a meeting quorum.

All RHNA Subcommittee members are expected to attend each meeting, to the extent feasible. RHNA Subcommittee members may attend meetings by teleconference or video-conference. All meetings of the RHNA Subcommittee are subject to the Brown Act. The Chair of the RHNA Subcommittee shall preside over all meetings and the Subcommittee may select another

## RHNA SUBCOMMITTEE CHARTER – 6<sup>th</sup> Cycle

Page 2 of 2

Subcommittee member to serve as the Vice-Chair in the Chair’s absence. The RHNA Subcommittee will invite SCAG staff or others to attend meetings and provide pertinent information, as necessary. Meeting agendas will be prepared and provided in advance to RHNA Subcommittee members, along with appropriate briefing materials and reports, in accordance with the Brown Act. Minutes of each meeting will be prepared.

For purposes of voting, each county shall be entitled to one (1) vote to be cast by either the primary member or alternate member representing the respective county. In the event of a tie vote, the Chair of the Subcommittee may vote to break the tie except if the Chair of the Subcommittee has casted a vote as a Subcommittee member. In that exception, the Vice Chair of the Subcommittee may break the tie vote. In the case of an appeal submitted on behalf of a Subcommittee member’s individual local jurisdiction, the Subcommittee member may elect not to participate in the discussion and vote by the RHNA Subcommittee regarding such appeal.

### Responsibilities

The RHNA Subcommittee will carry out the following responsibilities:

- Review information useful to the development of the RHNA Plan;
- Review and make policy decisions related to the RHNA process including policies for the RHNA methodology, the RHNA methodology, and the draft and final RHNA allocations, and forward such decisions to the CEHD Committee for review and approval. In making its policy decisions, the RHNA Subcommittee should consider the integration of the RHNA with the Regional Transportation Plan/Sustainable Communities Strategy;
- Review and make decisions regarding guidelines for the RHNA process including guidelines related to subregional delegation, and forward such decisions to the CEHD Committee for review and approval; and
- Review and make the final decisions regarding appeals related to the jurisdiction’s draft RHNA allocation. In this capacity, the RHNA Subcommittee shall be known as the “RHNA Appeals Board.” These final decisions by the RHNA Appeals Board shall not be reviewable by the CEHD Committee or by the Regional Council.



September 23, 2020

Housing & Community Development  
Attn: Megan Kirkeby, Deputy Director  
2020 W. El Camino Avenue, Suite 500  
Sacramento, CA 95833

**Re: 5<sup>th</sup> Cycle (2013-2021) Housing Element Notice of Noncompliance Response**

Dear Ms. Kirkeby:

On September 21, 2020, City of Huntington Park staff and Housing and Community Development (HCD) staff met via conference call to discuss your letter dated August 24, 2020 regarding the City's noncompliance status for its 5<sup>th</sup> Cycle Housing Element. I, along with the City's Planning Manager, Carlos Luis, and Melinda Coy of HCD discussed the purpose of your letter and the necessary steps needed in order to make progress towards a compliant Housing Element.

During the meeting, we informed Melinda Coy of the various challenges faced by the City of Huntington Park. As you may know, the City of Huntington Park is a 3.003 square mile City located in the Southeast area of Los Angeles County. We are home to 60,000 plus residents within a very small geographical area. Of the 60,000 residents, 45 percent are first generation immigrants. In this small area, we have 32 schools, and based on the latest statistic, approximately 40% of its population is under 21 years of age. The City of Huntington Park ranks 17<sup>th</sup> in the nation on the list of Cities with the highest density. As you would imagine, we face many challenges and constraints due to this high density. These challenges and constraints include, but are not limited to:

- Built out community;
- Limited land availability;
- Increasing land values (\$357,500 median owner-occupied value);
- Aging infrastructure (60-95 year old systems);
- Overcrowding (19.4 % overcrowded units and 20.5% severely overcrowded units);
- Lack of open space (0.7 park acres per 1,000 residents);
- Inadequate parking;
- Saturation of rental units (73% renter-occupied units);
- Absentee landlords;
- High demand for public transportation

**5<sup>th</sup> Cycle Housing Element Notice of Noncompliance Response**  
**Department of Housing and Community Development – Megan Kirkeby**  
**September 23, 2020**  
**Page 2 of 3**

During the last 20 years, the former leadership of the City built a significant number of apartment units without a parking requirement, reducing opportunities to increase our needed open space for our large young population, creating a severe parking problem, and a serious overcrowded situation in the City. This overwhelming situation, as you probably may imagine, brought an additional financial burden to the City due to the increase of the services that were needed to provide to the public. Nowadays, with the financial challenges faced by the pandemic, the lack of general revenue and sale tax will definitively exacerbate the financial impact in the City's budget in the years to come.

Despite facing the challenges and constraints described before and as indicated in the previous paragraph, the City of Huntington Park has a rich history of supporting affordable housing development. Among all the apartment units that were approved and built during the abovementioned 20 years, the City facilitated the development of eight residential developments and the acquisition/rehabilitation of six projects with long-term affordability covenants on all or some of the units. These projects include Concord Huntington Park, Seville Gardens, Casa Rita, Rugby Senior Apartments, Casa Bonita, Rita Court, Santa Fe Village, Casa Bella, Bissell Apartments, Bissell II, Bissell III, 6700 Middleton Street, 6822 Malabar Street, and Mosaic Gardens. These 14 projects provide a total of 557 affordable units.

We want to let you know that the City's Administration is aware of the required statutory housing measures, but we believe that it would be irresponsible to just fulfill that requirement and commit to build thousands of units more without addressing all the additional challenges and burdens that we are facing at this moment, and to create more to pass it on to future generations forming a never ending vicious cycle in which the quality of life of our residents continuous being the same: overconcentration of poverty, lack of open space, overcrowding, and a large increment of rental units that will perpetuate the problem.

Our City Council is committed to face this situation and has recently formed an Ad Hoc Housing Committee to focus on finding a permanent and real solution to the housing problem that they inherited, and develop a strategy/plan with the support of your department, and the Governor's office. Therefore, we are asking you to provide us with the opportunity for this committee to work for the next four months and prepare a report with our plan of action to address the noncompliance status of the 5<sup>th</sup> Cycle Housing Element.

In addition to the work that will be performed by the committee, our staff will work closely with your staff and our Gateway Cities Council of Government to research similar cases faced by other municipalities and to use the available tools to complete our task.

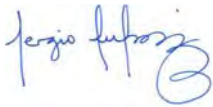


**5<sup>th</sup> Cycle Housing Element Notice of Noncompliance Response**  
**Department of Housing and Community Development – Megan Kirkeby**  
**September 23, 2020**  
**Page 3 of 3**

There is no doubt the City of Huntington Park wants to be in compliance, but at the same time, we also want to develop a plan for a permanent a solution that will provide a better quality of life to our residents; we believe they deserve it.

We thank you for your consideration and we hope to hear back from you soon with a positive response to our request. If you have any questions, please feel free to contact me at (323) 584-6318 or via email at SInfanzon@hpca.gov

Sincerely,



Sergio Infanzon  
Director of Community Development

cc: City Council  
Ricardo Reyes, City Manager  
Melinda Coy, HCD Land Use & Planning Manager

August 30, 1999

Joe Carreras, Comprehensive Planning Manager  
Southern California Association of Governments  
818 West Seventh Street – 12<sup>th</sup> Floor  
Los Angeles, California 90017-3435

**Re: Huntington Park Regional Housing Needs Assessment and Housing Growth Forecast.**

Dear Mr. Carreras,

This letter is to address an error or oversight and other serious concerns regarding the SCAG RHNA and housing forecasts for the City of Huntington Park.

The RHNA total construction need calculated for Huntington Park of 1011 housing units is both incorrect and represents an unjustified high number compared to other cities in the Gateway Cities subregion. The SCAG RHNA calculation does not reflect the current SCAG growth forecast for housing for 2005 of 15,020 units, resulting in a RHNA construction need of 965 units (see attachments).

**We hereby request to meet with you as soon as possible to discuss the calculations and how we may ensure that we can appropriately incorporate necessary corrections and more realistic enumerations.**

Our analysis indicates various contradictions and questions of how SCAG arrived at their numbers which seem to allocate housing in higher proportions in some cities, especially in Huntington Park, over others for reasons which are not clear.

Some of our specific items of concern, in addition to the above-mentioned error, are:

1. Growth numbers for HP show 5.4% for 1997-2005, but the average for the subregion is 2.4%. Why is HP so much higher than the subregion (i.e. 125% higher), when HP is almost fully built out and the housing densities in Huntington Park are higher than the average in the subregion. A higher proportional growth in HP with already higher densities than the average represents a seemingly unfair allocation. Such a high growth is

not possible nor justified without some additional explanation of how the city would be assisted relative to other cities and how associated inevitable significant environmental impacts would be mitigated.

2. The construction need calculated for HP of 965 units represents 6.8% growth (128 units per year) compared to the 3.1% for the 18,546 units in the subregion.
3. The high SCAG growth and construction need and replacement need numbers for HP do not correlate with what we have experienced. The attached data for HP building permit records show 228 net units from 1990 to 1997 which is 1.57% and 28.5 units per year; the California Dept. of Finance housing estimates for HP shows 332 units from 1990 to 1997 which is 2.38% and 41.5 units per year.

**A housing construction need growth rate closer to this historical rate of approximately 2% would be more realistic than the SCAG RHNA calculation of 6.8%.** A 2% growth would also be considered high due to the city’s efforts to significantly increase housing density and opportunity in new mixed-use residential districts, which have resulted in the completion of three large housing projects. Growth at a higher rate is impossible given the environmental impact mitigations, time, financing, infrastructure, schools, and city fiscal and other resources required. As an example, our school district, Los Angeles Unified School District, is already seriously impacted by overcrowded conditions. You have indicated that the housing growth numbers are also based in some way on employment, and our low employment growth (in the 2% range by your estimates) also does not fairly support your high housing figures.

We also concur with the June 4, 1999 letter to you from Chuck Ebner on behalf of the Gateway Cities Council of Governments. For example, the RHNA calculations do not take into consideration planning principles such as supporting transit corridors or other areas where development is better suited with developable land and infrastructure both sub-regionally and regionally.

See the attached tables for more detailed information.

Thank you for your assistance and please call to set a time that our staff may meet with you and any other appropriate SCAG staff so that we may expeditiously resolve these matters.

Sincerely,















Jack L. Wong  
 Assistant City Manager/Director of Community Development and Redevelopment

**QuickFacts**

**Huntington Park city, California**

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

**Table**

| All Topics     | Huntington Park city, California  |
|---|---|
| <b>Population estimates, July 1, 2019, (V2019)</b>  | <b>57,509</b>   |
|  <b>PEOPLE</b> |   |
| <b>Population</b>   |   |
| <b>Population estimates, July 1, 2019, (V2019)</b>  | <b>57,509</b>   |
| Population estimates base, April 1, 2010, (V2019)   | 58,125  |
| Population, percent change - April 1, 2010 (estimates base) to July 1, 2019, (V2019)            | -1.1%   |
| Population, Census, April 1, 2010   | 58,114  |
| <b>Age and Sex</b>  |   |
| Persons under 5 years, percent  |  7.6%    |
| Persons under 18 years, percent   |  28.3%   |
| Persons 65 years and over, percent  |  8.3%    |
| Female persons, percent   |  50.0%   |
| <b>Race and Hispanic Origin</b>   |   |
| White alone, percent  |  64.8%   |
| Black or African American alone, percent (a)  |  1.3%    |
| American Indian and Alaska Native alone, percent (a)  |  0.7%    |
| Asian alone, percent (a)  |  0.6%    |
| Native Hawaiian and Other Pacific Islander alone, percent (a)                                   |  0.3%    |
| Two or More Races, percent  |  1.0%    |
| Hispanic or Latino, percent (b)   |  96.7%  |
| White alone, not Hispanic or Latino, percent  |  1.5%  |
| <b>Population Characteristics</b>   |   |
| Veterans, 2014-2018   | 426   |
| Foreign born persons, percent, 2014-2018  | 46.3%   |
| <b>Housing</b>  |   |
| Housing units, July 1, 2019, (V2019)  | X   |
| Owner-occupied housing unit rate, 2014-2018   | 27.2%   |
| Median value of owner-occupied housing units, 2014-2018   | \$377,200   |
| Median selected monthly owner costs -with a mortgage, 2014-2018                                 | \$1,867   |
| Median selected monthly owner costs -without a mortgage, 2014-2018                              | \$487   |
| Median gross rent, 2014-2018  | \$1,028   |
| Building permits, 2019  | X   |
| <b>Families &amp; Living Arrangements</b>   |   |
| Households, 2014-2018   | 14,577  |
| Persons per household, 2014-2018  | 4.02  |
| Living in same house 1 year ago, percent of persons age 1 year+, 2014-2018                      | 91.5%   |
| Language other than English spoken at home, percent of persons age 5 years+, 2014-2018          | 91.9%   |
| <b>Computer and Internet Use</b>  |   |
| Households with a computer, percent, 2014-2018  | 84.0%   |
| Households with a broadband Internet subscription, percent, 2014-2018                           | 71.7%   |
| <b>Education</b>  |   |
| High school graduate or higher, percent of persons age 25 years+, 2014-2018                     | 45.0%   |
| Bachelor's degree or higher, percent of persons age 25 years+, 2014-2018                        | 5.9%  |
| <b>Health</b>   |   |
| With a disability, under age 65 years, percent, 2014-2018                                       | 5.0%  |
| Persons without health insurance, under age 65 years, percent                                   |  21.2% |
| <b>Economy</b>  |   |
| In civilian labor force, total, percent of population age 16 years+, 2014-2018                  | 64.6%   |
| In civilian labor force, female, percent of population age 16 years+, 2014-2018                 | 54.5%   |
| Total accommodation and food services sales, 2012 (\$1,000) (c)                                 | 82,705  |
| Total health care and social assistance receipts/revenue, 2012 (\$1,000) (c)                    |   |

|   |          |
|---|----------|
| Total manufacturers shipments, 2012 (\$1,000) (c)   |          |
| Total merchant wholesaler sales, 2012 (\$1,000) (c) | 399,298  |
| Total retail sales, 2012 (\$1,000) (c)              | 622,664  |
| Total retail sales per capita, 2012 (c)             | \$10,612 |

**Transportation**

|  |      |
|--|------|
| Mean travel time to work (minutes), workers age 16 years+, 2014-2018 | 31.2 |
|--|------|

**Income & Poverty**

|  |          |
|--|----------|
| Median household income (in 2018 dollars), 2014-2018             | \$40,638 |
| Per capita income in past 12 months (in 2018 dollars), 2014-2018 | \$14,410 |
| Persons in poverty, percent                                      | ▲ 26.1%  |

 **BUSINESSES**

**Businesses**

|   |       |
|---|-------|
| Total employer establishments, 2018         | X     |
| Total employment, 2018                      | X     |
| Total annual payroll, 2018 (\$1,000)        | X     |
| Total employment, percent change, 2017-2018 | X     |
| Total nonemployer establishments, 2018      | X     |
| All firms, 2012                             | 4,541 |
| Men-owned firms, 2012                       | 2,187 |
| Women-owned firms, 2012                     | 2,007 |
| Minority-owned firms, 2012                  | 3,953 |
| Nonminority-owned firms, 2012               | 470   |
| Veteran-owned firms, 2012                   | 133   |
| Nonveteran-owned firms, 2012                | 4,291 |

 **GEOGRAPHY**

**Geography**

|                                  |          |
|----------------------------------|----------|
| Population per square mile, 2010 | 19,287.8 |
| Land area in square miles, 2010  | 3.01     |
| FIPS Code                        | 0636056  |

About datasets used in this table

**Value Notes**

▲ Estimates are not comparable to other geographic levels due to methodology differences that may exist between different data sources.

Some estimates presented here come from sample data, and thus have sampling errors that may render some apparent differences between geographies statistically indistinguishable. Click the Quick Info ⓘ icon in TABLE view to learn about sampling error.

The vintage year (e.g., V2019) refers to the final year of the series (2010 thru 2019). *Different vintage years of estimates are not comparable.*

**Fact Notes**

- (a) Includes persons reporting only one race
- (b) Hispanics may be of any race, so also are included in applicable race categories
- (c) Economic Census - Puerto Rico data are not comparable to U.S. Economic Census data

**Value Flags**

- Either no or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest or upper open ended distribution.
- D Suppressed to avoid disclosure of confidential information
- F Fewer than 25 firms
- FN Footnote on this item in place of data
- N Data for this geographic area cannot be displayed because the number of sample cases is too small.
- NA Not available
- S Suppressed; does not meet publication standards
- X Not applicable
- Z Value greater than zero but less than half unit of measure shown

QuickFacts data are derived from: Population Estimates, American Community Survey, Census of Population and Housing, Current Population Survey, Small Area Health Insurance Estimates, Small Area Income Estimates, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permits.

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- Local governments must prepare and implement housing elements that are coordinated with State and Federal efforts in providing opportunities for new housing.
- Local governments must cooperate with other agencies and governments to address regional housing needs.
- This Housing Element also evaluates the current Regional Housing Needs Assessment (RHNA) developed by the Southern California Association of Governments (SCAG) and indicates how the City intends to accommodate the future housing demand identified by the RHNA. The RHNA calls for an additional 895 units to be provided during the 2013-2021 planning period.

While the City's development patterns were well established in the decades preceding the Second World War, the availability of housing remains one of the key planning issues in the community. New higher density development has occurred over the past several decades. The challenges the City will face in the coming years include the following:

- The availability of land for new housing development in the City is limited/ Huntington Park is fully developed and any new housing construction will consist of infill development.
- The majority of the City's land area is already developed as residential. The challenge in the future will be to retain the balance between the residential neighborhoods and the commercial and industrial areas.
- The character of the City's housing stock has undergone significant changes in the past five decades. Neighborhoods that were once largely single-family following the Second World War have undergone redevelopment to much higher densities.
- The elimination of redevelopment has had a dramatic impact on the City's ability to raise revenue for new housing programs and to assemble parcels for new residential development.



## OVERVIEW OF THE CITY OF HUNTINGTON PARK

The City of Huntington Park was incorporated on September 1, 1906, with a population of 526 residents.<sup>1</sup> The City developed as a suburban community, providing a centralized location for workers employed in Los Angeles and the surrounding industrial cities of Commerce, Vernon, and South Gate. The City's land use and development patterns were well established by the 1930's. A thriving downtown centered along Pacific Avenue was testament to the area's prosperity.<sup>2</sup> A map of the City is provided in **Exhibit 6-1**.

As the post World War II era progressed, the City began to experience a shift in its demographics character. In addition, the decline of the manufacturing sector in the area also contributed to the economic transition that affected the region. According to the most recent State of California Department of Finance estimates for January 2015, the City's population was 59,312 persons.<sup>3</sup> Key development and land use patterns are summarized in the following paragraphs.<sup>4</sup>

- The City of Huntington Park contains a variety of uses; however, the most prominent land use in the City is residential. Extensive residential development of varying densities is observed east of Seville Avenue, extending east to the City's easternmost boundary, north to the City's northernmost boundary, and south to the City's southernmost boundary. Residential land uses are also located west of Pacific Avenue and extend as far west as Regent Street.
- Commercial development is found along the major roadways that traverse the City including Slauson Avenue, Pacific Boulevard, Gage Avenue, Santa Fe Avenue, and Florence Avenue. In addition, small pockets of commercial development occupy the frontages along many of the residential streets. The heaviest concentration of commercial uses is located in the City's downtown area along the Pacific Boulevard corridor which functions as the City's central business district.

<sup>1</sup> City of Huntington Park. *History of Huntington Park*. <http://www.hpca.gov/index.aspx?nid=99>

<sup>2</sup> Ibid.

<sup>3</sup> State of California Dept. of Finance. Table E-5 City/County Population and Housing Estimates, Revised January 1, 2015.

<sup>4</sup> Blodgett Baylosis Environmental Planning. *Field Survey* (the field surveys were completed during vMay and June of 2015).





the County median would fall into this category. Based on a 2010 Los Angeles County median income (\$61,632), an extremely low-income household would have a median annual income of \$18,490 or less.

## LAND AVAILABLE TO ACCOMMODATE RHNA HOUSING NEED

The City of Huntington Park is fully developed and, as a result, any new residential development will consist of infill development within properties that are currently vacant or underutilized. New residential development may also occur within residentially zoned properties where the existing land uses are non-residential at the present time. The Land Use Element contains two residential land use categories and a single category each for commercial, industrial, open space, and institutional.

- **Residential, Low-Density.** This land use designation contemplates lower density residential development, including single-family homes, within those properties that are so designated. The maximum development density is 8.71 dwelling units per acre. (One unit per parcel is permitted with a minimum lot size of 5,000 square feet.) This designation is limited to properties improved with existing single-family (detached) dwelling units.
- **Residential, Medium-Density.** This land use designation permits higher density residential development that includes multiple-family development (town homes, condominiums, and apartments). The maximum development density is 21.78 units per acre. The corresponding zone districts include R-1, R-2, R-3, and C-3R zones.

The primary infill housing strategy focuses on the identification of a specific area of the City that could be developed in residential uses. Three available sites were identified as potential candidates that would enable the City to accommodate its RHNA allocation. The sites are identified in Appendix A.



**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Ave  
Sacramento, CA 95833-1829  
916) 263-2911 FAX: (916) 263-7453  
www.hcd.ca.gov



December 10, 2020

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

Dear Executive Director Ajise:

**RE: Comment on Appeals of the Draft Regional Housing Need Allocation (RHNA) Plan**

Thank you for the opportunity to comment on the 52 appeals Southern California Association of Governments (SCAG) has received regarding the draft RHNA plan. The appeal process is an important phase in the development of a RHNA plan that ensures that all relevant factors and circumstances are considered.

The only circumstances under which a jurisdiction can appeal are:

- 65584.05(b)(1): The council of governments failed to adequately consider the information regarding the factors listed in subdivision (e) of section 65584.04.
- 65584.05(b)(2): The council of governments failed to determine the share of the regional housing need in a manner that furthers the intent of the objectives listed in subdivision (d) of section 65584.
- 65584.05(b)(3): A significant unforeseen change in circumstances occurred in the local jurisdiction that merits a revision of the information submitted pursuant to subdivision (e) of Section 65584.04.

The California Department of Housing and Community Development (HCD) urges SCAG to only consider appeals that meet these criteria.

Per Government Code section 65584.05(e)(1), SCAG's final determination on whether to accept, reject, or modify any appeal must be accompanied by written findings, including how the final determination is based upon the adopted RHNA allocation methodology, and how any revisions are necessary to further the statutory objectives of RHNA described in Government Code section 65584(d).

Among the appeals based on Government Code section 65584.05(b)(1), several appeals state that SCAG failed to consider the factor described in Government Code section 65584.04(e)(2)(B), citing the lack of land suitable for development as a basis for the appeal. However, this section states the council of governments may not limit its consideration of suitable housing sites to existing zoning and land use restrictions and must consider the potential for increased development under alternative zoning and

land use restrictions. Any comparable data or documentation supporting this appeal should contain an analysis of not only land suitable for urban development, but land for conversion to residential use, the availability of underutilized land, and opportunity for infill development and increased residential densities. In simple terms, this means housing planning cannot be limited to vacant land, and even communities that view themselves as built out must plan for housing through means such as rezoning commercial areas as mixed-use areas and upzoning non-vacant land.

With regard to appeals submitted related to Government Code section 65584.05(b)(2), that SCAG failed to determine the RHNA in a manner that furthers the statutory objectives, it should be noted that HCD reviewed SCAG's draft allocation methodology and found that the draft RHNA allocation methodology furthered the statutory objectives described in Government Code section 65584.

Among the appeals based on Government Code section 65584.05(b)(2), several contend that the cap on units allocated to extremely disadvantaged communities (DACs) does not further RHNA's statutory objectives. This cap furthers the statutory objective to affirmatively further fair housing by allocating more units to high opportunity areas and fewer units to low resource communities, and concentrated areas of poverty with high levels of segregation. Due to the inclusion of this factor, as well as the use of TCAC/HCD Opportunity Maps, SCAG's methodology allocates 14 of the top 15 highest shares of lower-income RHNA to jurisdictions with over 99.95 percent High and Highest Resource areas. With the exceptions of two jurisdictions, the 31 jurisdictions with the highest share of lower-income RHNA are all over 95 percent High and Highest Resource areas. Any weakening of these inputs to the methodology could risk not fulfilling the statutory objective to affirmatively further fair housing.

Several appeals argue that SCAG's RHNA allocation methodology does not adequately promote access to jobs and transit, as required in objectives two and three. HCD's review of SCAG's RHNA methodology found the allocation does further the environmental principles of objective two. SCAG's overall allocation includes significant weight related to the location of high-quality transit areas and the regional distribution of jobs that can be accessed within a 30-minute driving commutes. Regarding objective three, HCD's analysis as to whether jobs-housing fit was furthered by SCAG's draft methodology found that across all jurisdictions there is generally good alignment between low-wage jobs and lower-income RHNA, with all but 15 jurisdictions within a half percent plus or minus difference between their share of lower-income RHNA for the region and their percentage low-wage jobs for the region.

Several appeals are based upon the provision described in Government Code section 65584.05(b)(3), arguing that the COVID-19 pandemic represents a significant and unforeseen change in circumstances that will affect future population and job growth. Ensuring everyone has a home is critical to public health. Reducing and preventing overcrowding and homelessness are essential concerns for every community. The COVID-19 pandemic has only increased the importance that each community is planning for sufficient affordable housing.

Lastly, several appeals state that the Regional Housing Needs Determination (RHND) HCD provided to the SCAG region is too large. SCAG submitted an objection to the RHND at the appropriate time and through the appropriate process. HCD considered those objections and [determined the final RHND for 6<sup>th</sup> Housing Element Cycle for the SCAG region on October 15, 2019](#). There are no further appeal procedures available to alter the SCAG region's RHND for this cycle. Government Code section 65584.05(b) does not allow local governments to appeal the RHND during the 45-day period following receipt of the draft allocation.

HCD acknowledges that many local governments will need to plan for more housing than in the prior cycle to accommodate a RHND that more fully captures the housing need and as the statutory objectives of RHNA shift more housing planning near jobs, transit, and resources. The Southern California region's housing crisis requires each jurisdiction to plan for the housing needs of their community and the region. In recognition of this effort there are more resources available than ever before to support jurisdictions as they prepare to update their 6<sup>th</sup> cycle housing elements:

- SB 2 Planning Grants – \$123 million one-time allocation to cities and counties
- SB 2 Planning Grants Technical Assistance offered to all jurisdictions
- Regional and Local Early Action Planning Grants – \$238 million one-time allocation for local and regional governments
- SB 2 Permanent Local Housing Allocation – approximately \$175 million annually in ongoing funding for local governments to increase affordable housing stock

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Megan Kirkeby, Deputy Director, [megan.kirkeby@hcd.ca.gov](mailto:megan.kirkeby@hcd.ca.gov).



Megan Kirkeby  
Deputy Director



# City of Whittier

13230 Penn Street, Whittier, California 90602-1716  
(562) 567-9320 Fax (562) 567-2872 www.cityofwhittier.org

Electronically Transmitted to: [Housing@scag.ca.gov](mailto:Housing@scag.ca.gov)

December 10, 2020

RHNA Appeals Committee  
Southern California Association of Governments  
900 Wilshire Blvd, Suite 1700  
Los Angeles, CA 90017

SUBJECT: City of Whittier's Comments on Appeals to the Sixth Cycle Regional Housing Needs Assessment (RHNA) Allocation

Honorable Chair and Honorable Committee Members:

The City of Whittier ("City") appreciates the challenges that are inherent in allocating 1,341,827 housing units by the thousands (a 226% increase above the baseline 412,137 unit) to cities across Southern California, especially in built-out cities. However, the City is deeply concerned its housing allocation of 3,431 units from the State Department of Housing and Community Development ("HCD") and the Southern California Association of Government's ("SCAG") unit distribution methodology, along with recent housing legislation will fundamentally abridge the City's ability to develop effective land-use policies that are appropriate for managing the community's actual needs. The 878 units in the 5<sup>th</sup> cycle RHNA allocation has been increased by 290% to 3,431 units in the current 6<sup>th</sup> cycle. Particularly challenging in the 6<sup>th</sup> cycle, is the number of low and very low-income units (1,558) which combined with the moderate and above moderate unit totals forces unplanned and unnecessary residential densification of the community.

The affordable units are an unfunded mandate with very limited regional or State financial support for their development. Considering the affordable housing subsidies typically range from \$50,000 to \$250,000 per unit, the overall funding requirements could range from \$78,000,000 to \$390,000,000 which is clearly beyond the reach of the City of Whittier in that the City's general fund budget is just \$72,000,000 which already include \$2,000,000 annually to house the City's unsheltered residents in transitional housing. Additionally, the City only receives 7.5% of each property tax dollar to provide general services including police and library services.

The City is currently in the process of updating its Housing Element as well as the General Plan to incorporate the current RHNA allocation, so Whittier is acutely aware of the various housing needs as well as the potential obstacles, such as aging infrastructure and unplanned density, to creating the requisite housing within a city that

is essentially built out. The changes in the State's housing laws (SB 35, SB 166 and AB 1397) have created additional constraints for the agencies and may severely impact the City's ability to accomplish our regional and local housing goals.

Since development in Whittier began more than 130 years ago, the City is virtually built-out with little developable vacant land outside of its designated open space areas that are dedicated to accommodating existing and future residents. While the City has made significant efforts through its specific plans to densify existing corridors and districts, the majority of Whittier's remaining single-family residential neighborhoods cannot accommodate similar densification. Furthermore, the hills north of Whittier contain regional open space, sensitive habitat and wildlife areas that must be preserved in perpetuity. There are also significant infrastructure and water service constraints that impact Whittier's ability to produce significantly more housing. Although these facts may not be desirable, they must be pragmatically accounted for and mitigated by not further increasing Whittier's share of housing units contained in SCAG's 6<sup>th</sup> Cycle RHNA. The final RHNA allocation and methodology must be fair and equitable while reflecting the capacity for reasonable housing unit construction.

As with many other cities, the City is concerned about the current allocation, but an even greater concern is that additional units may be applied to the City if reallocated from cities that are successful in their appeals. To that end, the City believes the appeal process itself was unclear as to the potential ramifications to other cities and not fully understood.

Although we fully support the surrounding cities in their appeals, the potential for additional units being applied to the City would exacerbate the problems described herein and in Whittier's September 13, 2019 letter to SCAG.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Jeffery S. Adams  
Director of Community Development

File

**From:** Christopher Koontz <Christopher.Koontz@longbeach.gov>  
**Sent:** Thursday, December 3, 2020 11:14 AM  
**To:** Regional Housing  
**Subject:** RHNA Appeals

**Categories:** Response Required, Record

Good morning,

The purpose of this email is to provide the City of Long Beach's position in regards to pending RHNA appeals before SCAG. The City of Long Beach seeks to meet its housing needs and obligations for the benefit of Long Beach residents and the region. Our allocation was extremely large and presents a planning and financing challenge for the City. Nonetheless we chose not to appeal our allocation because the allocation process was fair and transparent including taking the City of Long Beach's input into consideration.

We oppose and will not accept any transfer of additional allocation due to the pending appeals. We note that within our area, the Gateway COG, appeals are pending from Bellflower, Cerritos, Downey, Huntington Park, La Mirada, Lakewood, Pico Rivera, and South Gate. Each of these appeals should be evaluated by SCAG on the merits, however Long Beach opposes any transfer of allocation to our City. It would be inappropriate to transfer a further burden to Long Beach when we have already accepted a large allocation and have done more than many cities in the region to accommodate housing growth under the current RHNA cycle, including fully meeting our market-rate RHNA allocation.

The City of Long Beach will continue to work with SCAG and our neighbor jurisdictions to address the housing needs of our residents.

We thank you for consideration and please do not hesitate to contact the City regarding our position.

Christopher Koontz, AICP  
*Deputy Director*

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Southern California Association of Governments  
Remote Participation Only  
January 8, 2021

**To:** Regional Housing Needs Assessment Subcommittee (RHNA)

**EXECUTIVE DIRECTOR'S  
APPROVAL**

**From:** Karen Calderon, Associate Regional Planner,  
(213) 236-1983, calderon@scag.ca.gov

**Subject:** Appeal of the Draft RHNA Allocation for the City of Cerritos

**RECOMMENDED ACTION:**

Deny the appeal filed by the City of Cerritos (City) to reduce the Draft RHNA Allocation for the City by 129 units.

**STRATEGIC PLAN:**

This item supports the following Strategic Plan Goal 2: Advance Southern California’s policy interests and planning priorities through regional, statewide, and national engagement and advocacy.

**SUMMARY OF APPEAL:**

The City of Cerritos requests a reduction of its RHNA allocation by 129 (from 1,903 units to 1,774 units) based on the following issues:

1. Application of the adopted Final RHNA Methodology for the 6<sup>th</sup> Cycle (2021 – 2029):
  - a. existing need due to job accessibility
  - b. allocation percentages for each income category
2. Availability of land suitable for conversion to residential use – low quantity of underused parcels.

In addition, the City asserts that HCD improperly calculated the regional RHNA allocation.

**RATIONALE FOR STAFF RECOMMENDED ACTION:**

Staff have reviewed the appeal and recommend no change to the City of Cerritos’ RHNA allocation. Regarding Issue 1a, the City proposes an alternative data source to calculate job accessibility which would yield a modest reduction in job accessibility in Cerritos; however, the employment data relied upon by SCAG was previously verified by city staff. Regarding Issue 1b, Cerritos requests a minor change to the income levels of units in its RHNA allocation; however, the City’s Draft RHNA Allocation was determined to be consistent with the Final RHNA Methodology. Regarding Issue 2, the City has not provided evidence that lands are unavailable to meet the Draft RHNA Allocation.

**OUR MISSION**

*To foster innovative regional solutions that improve the lives of Southern Californians through inclusive collaboration, visionary planning, regional advocacy, information sharing, and promoting best practices.*

**OUR VISION**

*Southern California’s Catalyst for a Brighter Future*

**OUR CORE VALUES**

*Be Open | Lead by Example | Make an Impact | Be Courageous*



**BACKGROUND:****Draft RHNA Allocation**

Following the adoption of the Final RHNA Methodology on March 5, 2020 and the adoption of Connect SoCal on September 3, 2020, the City of Cerritos received its Draft RHNA Allocation on September 11, 2020. A summary is below.

**Total RHNA for the City of Cerritos: 1,903 units**

Very Low Income: 678 units  
Low Income: 344 units  
Moderate Income: 331 units  
Above Moderate Income: 550 units

Additional background related to the Draft RHNA Allocation is included in Attachment 1.

**Summary of Comments Received during 45-day Comment Period**

No comments were received from local jurisdictions or HCD during the 45-day public comment period described in Government Code section 65584.05(c) which specifically regard the appeal filed for the City of Cerritos. Three comments were received which relate to appeals filed generally:

- HCD submitted a comment on December 10, 2020 delineating the statutory basis for RHNA appeals and the requirement that any appeals granted must include written findings regarding how revisions are necessary to further RHNA's statutory objectives.
- The City of Whittier submitted a comment on December 10, 2020 supporting surrounding cities in their appeals but expressing concern that additional units may be applied to Whittier if reallocated from cities which are successful in their appeals.
- The City of Long Beach submitted a comment on December 3, 2020 indicating their view that the RHNA allocation process was fair and transparent, their support for evaluating appeals on their merits (specifically those from the Gateway Council of Governments), and their opposition to any action which would result in a transfer of additional units to Long Beach.

**ANALYSIS:**

**Issue 1a: Adopted Final RHNA Methodology for the 6th Cycle RHNA (2021-2029) [Government Code Section 65584.05 (b)(1)] - existing need due to job accessibility.**

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*Cerritos requests an alternative data source be used to assess job accessibility in Cerritos which would reduce the city's level of job accessibility from 21.29% to 19.79%. This would reduce the City's total RHNA allocation by 129 units.*

**SCAG Staff Response:** SCAG appreciates the City's continued engagement in the RHNA process as well as the Bottom-Up Local Input and Envisioning Process. As detailed in Attachment 1 below, SCAG and the City of Cerritos engaged in extensive communication regarding input data for Connect SoCal, including current and future employment.

As detailed in Connect SoCal's Demographics and Growth Forecast Technical Report<sup>1</sup>, SCAG utilizes numerous data sources to develop jurisdiction-level growth forecasts, including the American Community Survey (ACS), the state Employment Development Department (EDD), and business establishment-level data from InfoGroup. SCAG's preliminary employment forecasts for Cerritos were 38,953 in 2016 and 40,849 in 2045.

Following their review, the City of Cerritos recommended reducing its 2045 employment outlook to 39,183 jobs. A data input and verification form was signed by City Manager Art Gallucci on September 17, 2018 and returned to SCAG with this update (attached). This is the employment figure used in Connect SoCal and referenced in Cerritos' appeal as being too high. Cerritos proposes an alternative source of data better reflects the City's true level of employment: the American Community Survey (ACS) 5-year estimate (2012-2016) of 34,850 workers.

Cerritos acknowledges that the RHNA methodology is based on the jobs which are accessible from Cerritos (21.29% of the region's employment in 2045, or 2,139,000 million jobs<sup>2</sup>) rather than the number of jobs in the city itself. However, since Cerritos' alternative proposed data source indicates about 4,200 fewer jobs in Cerritos, that would slightly decrease the number of jobs *accessible* to residents of Cerritos (to 2,135,000 jobs, or 21.25% of the region's employment in 2045). Cerritos suggests that this alternative data source would merit a 1.5% reduction in the job access share to 19.79%.

While the requested change is relatively modest (6.7% of the draft allocation), SCAG staff cannot recommend this change. The current and future employment totals for Cerritos used in Connect SoCal are not only based on more recent and comprehensive data but they were formally agreed to by SCAG and Cerritos during the Bottom-Up Local Input and Envisioning Process.

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<sup>1</sup> [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial\\_demographics-and-growth-forecast.pdf](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf)

<sup>2</sup> Based on Connect SoCal's 2045 regional employment forecast of 10,049,000 jobs.

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**Issue 1b: Adopted Final RHNA Methodology for the 6th Cycle RHNA (2021-2029) [Government Code Section 65584.05(b)(2)] - allocation for each income category is incorrect when based on the social equity adjustment formula.**

*Cerritos notes that the Draft RHNA Allocation's distribution of housing units across the four income categories differs from the calculation referenced in the RHNA methodology as a result of the "normalization adjustment" which was applied by SCAG in order to ensure that housing unit totals by income category match HCD's regional determination. Cerritos notes that this adjustment noticeably skewed Cerritos' allocation and requests that the original adjustment using the formula referenced in the methodology be used directly.*

**SCAG Staff Response:** To further the objectives of allocating a lower proportion of households by income and affirmatively furthering fair housing (AFFH), the RHNA methodology includes a minimum 150 percent social equity adjustment and an additional 10 to 30 percent added in areas with significant populations that are defined as very low or very high resource areas, referred to as an AFFH adjustment. A social equity adjustment ensures that jurisdictions accommodate their fair share of each income category. It does so by adjusting current household income distribution in comparison to county distribution. The result is that jurisdictions that have a higher concentration of lower income households than the county will receive lower percentages of RHNA for the lower income categories.

After determining the social equity adjustment for each local jurisdiction, SCAG needed to apply a normalization adjustment to ensure that the regional total by income category matched the totals indicated in HCD's regional determination (attached).

Per statute, and following the direction of the SCAG Regional Council, the final RHNA methodology integrates a wide range of policy factors. Unlike in past cycles, HCD did not provide a range of values for the regional determination. In order to avoid allocating housing units to local jurisdictions in excess of the already high figure of 1,341,827 units, SCAG used the precise number called for by HCD.

However, there is the possibility of some mathematical imbalance in the social equity adjustment which results in the small percentage differences by income category noted by Cerritos. Following the percentages in the social equity adjustment without any normalization results in allocating 3.3% too many above-moderate income units and 4.8% too few very-low income units region-wide. The normalization process proportionately reallocates this small discrepancy across all jurisdictions in the region and also ensures that cities are allocated whole number values rather than fractions of housing units. As Cerritos notes, this discrepancy results in an increase in 28 very-low income units (1.4%), and a decrease in 2 moderate-income units (0.1%), a decrease in 1 low-income unit (0.0%), and a decrease in 25 above-moderate income units (1.3%).

While this normalization adjustment was not discussed in as much detail as other aspects of the RHNA methodology, it was included on page 17 of the adopted final RHNA methodology and the formula itself was available in the Excel-based RHNA estimate tool posted online. Since the final calculation of income levels was conducted pursuant to the final RHNA methodology and in a fair and consistent manner across all local jurisdictions, staff does not recommend adjusting Cerritos' draft RHNA allocation accordingly.

**Issue 2: Availability of land suitable for urban development or for conversion to residential use [Government Code Section 65584.04(e)(2)(B)].**

*The City argues that it is built out and developed, with very few vacant sites that are suitable for land development. It also suggests that that e-commerce coupled with displacement of existing commercial, office, and industrial uses to accommodate housing will negatively impact job growth and may further reduce Cerritos' employment by 2045.*

**SCAG Staff Response:** Per Government Code Section 65584.04(e)(2)(B), SCAG is not permitted to limit its consideration of suitable housing sites or land suitable for urban development to a jurisdiction's existing zoning and land use policies and restrictions (which includes the land use policies in its General Plan). "Available land suitable for urban development or conversion to residential use," as expressed in 65584.04(e)(2)(b), is not restricted to vacant sites; rather, it specifically indicates that underutilized land, opportunities for infill development, and increased residential densities are a component of 'available' land. As indicated by HCD in its December 10, 2020 comment letter (HCD Letter):

"In simple terms, this means housing planning cannot be limited to vacant land, and even communities that view themselves as built out must plan for housing through means such as rezoning commercial areas as mixed-use areas and upzoning non-vacant land." (HCD Letter at p. 2).

As such, the City can consider other opportunities for development including the availability of underutilized land, opportunities for infill development and increased residential densities, or alternative zoning and density.

Note that while zoning and capacity analysis is used to meet RHNA need, they should not be used to allocate RHNA need. Per the adopted RHNA methodology, RHNA need is determined by projected household growth, transit access, and job access. Housing need, both existing and projected need, is independent of zoning and other related land use restrictions, and in some cases is exacerbated by these very same restrictions. Thus, land use capacity that is restricted by factors unrelated to existing or projected housing need cannot determine existing or projected housing need.

As part of the Bottom-Up Local Input and Envisioning Process, SCAG included a draft map which used a rudimentary, region-wide approach to highlight potential infill or refill opportunities based on largely on property value. These were included for research purposes and were not used for growth forecasting or RHNA allocation purposes.

SCAG's growth forecast appreciates and integrates future uncertainty surrounding the nature of employment and conducted extensive analysis on e-commerce and "gig" work. However, the nature of an RTP/SCS is that a future employment total reflecting the most likely future scenario must be used for modeling and forecasting purposes. As described in Attachment 1 and illustrated by SCAG's revision to Connect SoCal based on Cerritos' requested change, this total was developed and reviewed with extensive local input. Cerritos does not request a specific reduction in its Draft RHNA Allocation on this basis; staff does not recommend any adjustment.

**Other:** *In addition to the issues raised above which are the bases for an appeal, Cerritos also asserts that HCD improperly calculated SCAG's regional housing need determination of 1,341,827 units for the 6<sup>th</sup> cycle of RHNA.*

SCAG's final regional determination of approximately 1.34 million units was issued by HCD on October 15, 2019 per state housing law. The regional determination is not a basis for appeal per adopted RHNA Appeals Procedures as it is not within the authority of the Appeals Board to make any changes to HCD's regional housing needs assessment. Only improper application of the methodology is grounds for an appeal. An example of an improper application of the adopted methodology might be a data error which was identified by a local jurisdiction.

SCAG's development of a consultation package to HCD regarding the regional housing needs determination took place during the first half of 2019. During this time SCAG extensively reviewed a wide range of reports which commented on housing needs in the state and region, including studies from USC, UCLA, UC-Berkeley, the California Legislative Analyst's Office, Beacon Economics, McKinsey, the Center for the Continuing Study of the California Economy, and others. These studies covered a wide range of approaches and methodologies for understanding housing need in the region and state. On March 27, 2019 SCAG convened a panel of fifteen experts in demographics, economics, and housing planning to assess and review the region's housing needs in the context of SCAG's regional determination.

Notwithstanding the merits of the various approaches toward estimating regional housing need, state statute outlines a very specific process for arriving at a regional housing needs determination for RHNA. It also prescribes a specific timeline which necessitated the completion of the regional determination step by fall 2019 in order to allow sufficient time for the development of a methodology, appeals, and local housing element updates.

During both the consultation process and the filing of SCAG's formal objection to HCD's regional determination, SCAG extensively reviewed the issues brought up in these recent reports including a variety of indicators of housing backlog such as cost burden, overcrowding, demolition, and vacancy. In addition, SCAG has a well-developed program for forecasting population and household growth in the region which is conducted with the advice and collaboration of the state Department of Finance's forecasting staff. SCAG assessed the relationship between the measures used and not used in its analyses in order to avoid overlap ("double counting").

A PowerPoint slide deck titled "Double counting in the latest housing needs assessment" was placed on the Embarcadero Institute's website during 2020 (last update September 2020)." Without commenting on the credibility or accuracy of this material, SCAG staff would note that in order for such materials to have been considered by HCD, they would have had to have been submitted by June of 2019. The RHNA statute provides defined timeframes guided by the deadline for the housing element revisions for HCD's RHNA determination and SCAG's Final RHNA Allocation Plan. HCD, in consultation with each council of governments (COG), shall determine each region's existing and projected housing need pursuant to Section 65584.01 at least two years prior to the scheduled revision required pursuant to Section 65588. Govt. Code § 65584(b). This "determination shall be based upon population projections produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans, in consultation with each council of governments." Govt. Code § 65584.01(b). HCD begins the process 26 months prior to the scheduled revision so the data HCD relies on is the available provided by the COGs at that time. Similarly, the COG issues its survey for information to develop the RHNA allocation methodology up to 30 months prior to the scheduled revision. By necessity, the data used for these processes is data available at that time.

Furthermore, the materials presented by the Embarcadero Institute are regional in nature and do not provide information on individual jurisdictions. For an appeal to be granted on the incorrect application of RHNA methodology, arguments and evidence must be provided that demonstrate the methodology was applied incorrectly to determine the jurisdiction's share of regional housing need. Because a regional study does not meet this criterion, these studies cannot be used to justify a particular jurisdiction's appeal. Moreover, any reduction would have to be redistributed to the region when in theory, all jurisdictions would be impacted by the regional study.

In sum, it would be untenable to reopen the process anytime new data or materials become available, particularly when there is a codified process. If so, there would be no finality to the process and local government could not meet the deadlines for their housing element updates. Procedurally, SCAG cannot consider a regional study outside of the regional determination process nor should it apply a regional study to reduce an individual jurisdiction's draft RHNA allocation. For

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these reasons, SCAG staff does not recommend a reduction to the jurisdiction's draft RHNA allocation.

**FISCAL IMPACT:**

Work associated with this item is included in the current FY20-21 Overall Work Program (300-4872Y0.02: Regional Housing Needs Assessment).

**ATTACHMENT(S):**

1. Local Input and Development of Draft RHNA Allocation (City of Cerritos)
2. Appeal Form and Supporting Documentation (City of Cerritos)
3. Data Input and Verification Form (City of Cerritos)
4. HCD final 6th Cycle Housing Need Determination for the SCAG Region
5. Comments Received During the Comment Period (General)

## **Attachment 1: Local Input and Development of the Draft RHNA Allocation**

This attachment sets forth the nature and timing of the opportunities which the City of Cerritos had to provide information and local input on SCAG's growth forecast, the RHNA methodology, and the Growth Vision of the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). It also describes how the RHNA Methodology development process integrates this information in order to develop the City of Cerritos' Draft RHNA Allocation.

### **1. Local input**

#### ***a. Bottom-Up Local Input and Envisioning Process***

On October 31, 2017, SCAG took the first step toward developing draft RHNA allocations by initiating the Bottom-Up Local Input and Envisioning Process. At the direction of the Regional Council, the objective of this process was to seek local input and data to prepare for Connect SoCal and the 6<sup>th</sup> cycle of RHNA.<sup>1</sup> Each jurisdiction was provided with a package of land use, transportation, environmental, and growth forecast data for review and revision which was due on October 1, 2018.<sup>2</sup> While the local input process materials focus principally on jurisdiction-level and Transportation Analysis Zone (TAZ) level growth, input on specific parcels, sites, and project areas were welcomed and integrated into SCAG's growth forecast as well as data on other elements. SCAG met one-on-one with all 197 local jurisdictions between November 2017 and July 2018 and provided training opportunities and staff support. Following input from SCAG's Technical Working Group (TWG), the Connect SoCal growth forecast reflected precisely the jurisdiction-level growth totals provided during this process.

The local input data included SCAG's preliminary growth forecast information. For the City of Cerritos, the anticipated number of households in 2020 was 15,571 and in 2030 was 15,814 (growth of 243 households). In May 2018, SCAG staff met with staff from the City of Cerritos to discuss the Bottom-Up Local Input and Envisioning Process and answer questions. Input from Cerritos on the growth forecast was received on September 17, 2018 in the form of a Data Input and Verification Form signed by City Manager Art Gallucci (attached). This indicated a household total of 15,467 in 2020 and 15,507 in 2030, for a revised level of household growth of 40 units during this period.

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<sup>1</sup> While the RTP/SCS and RHNA share data elements, they are distinct processes. The RTP/SCS growth forecast provides an assessment of reasonably foreseeable future patterns of employment, population, and household growth in the region given demographic and economic trends, and existing local and regional policy priorities. The RHNA identifies anticipated housing need over a specified eight-year period and requires that local jurisdictions make available sufficient zoned capacity to accommodate this need. A further discussion of the relationship between these processes can be found in Connect SoCal Master Response 1 at [https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal\\_Public-Participation-Appendix-2.pdf](https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal_Public-Participation-Appendix-2.pdf).

<sup>2</sup> A detailed list of data during this process reviewed can be found in each jurisdiction's Draft Data/Map Book at <https://scag.ca.gov/local-input-process-towns-cities-and-counties>



### ***b. RHNA Methodology Surveys***

On March 19, 2019, SCAG distributed a packet of methodology surveys, which included the local planning factor survey (formerly known as the AB2158 factor survey), Affirmatively Furthering Fair Housing (AFFH) survey, and replacement need survey, to SCAG jurisdictions' Community Development Directors. Surveys were due on April 30, 2019. SCAG reviewed all submitted responses as part of the development of the draft RHNA methodology. The City of Cerritos submitted the following surveys prior to the adoption of the draft RHNA methodology:

- Local planning factor survey
- Affirmatively Furthering Fair Housing (AFFH) survey
- Replacement need survey
- No survey was submitted to SCAG

### ***c. Connect SoCal Growth Vision and Additional Refinements***

Beginning in May 2018, SCAG's Sustainable Communities Working Group began the process of developing growth scenarios for the SCAG region. The culmination of this work was the development of the Connect SoCal Growth Vision, which directly uses jurisdictional-level growth projections from the Bottom-Up Local Input and Envisioning process, and also features strategies for growth at the TAZ-level that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Additional detail regarding the Connect SoCal Growth Vision, specifically the Transportation Analysis Zone (TAZ, or neighborhood) level projections is found at <https://www.connectsocial.org/Documents/DataMapBooks/Growth-Vision-Methodology.pdf>.

As a result of these strategies, in some jurisdictions growth at the TAZ-level differed from locally anticipated growth conveyed during the Bottom-Up Local Input and Envisioning Process.

As such, SCAG provided two additional opportunities for all local jurisdictions to make TAZ-level technical refinements on the topics of general plan capacities and entitlements. During the release of the draft Connect SoCal Plan, jurisdictions were notified on October 31, 2019 that SCAG would accept additional refinements until December 11, 2019. Following the Regional Council's decision to delay full adoption of Connect SoCal for 120 days due to the COVID-19 pandemic, all jurisdictions were again notified on May 26, 2020 that SCAG would accept additional refinements until June 9, 2020.

Connect SoCal Growth Vision data have been available to local jurisdiction staff during the entirety of this process through SCAG's Scenario Planning Model Data Management Site (SPM-DM) at <http://spmDM.scag.ca.gov> and updates were shared with local jurisdictions on technical refinements to the data in February 2020 and August 2020 to share the results of both review opportunities. SCAG

did not receive additional technical corrections from the City of Cerritos which differed from the Growth Vision in late 2019 or summer 2020.

**2. Development of the Final RHNA Methodology**

SCAG convened the first meeting of the RHNA Subcommittee in October 2018. In their subsequent monthly meetings, this body reviewed and advised on the development of SCAG’s 6<sup>th</sup> cycle RHNA process, including the development of the RHNA methodology. Per Government Code 65584.04(a), SCAG must develop a RHNA methodology which furthers the five statutory objectives of RHNA:

*(1) Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households.*

*(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region’s greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.*

*(3) Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.*

*(4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.*

*(5) Affirmatively furthering fair housing (Govt. Code § 65584(d)).*

As explained in more detail below, the Draft RHNA Methodology (which was adopted as the Final RHNA Methodology) set forth the policy factors, data sources, and calculations which would be used to generate draft RHNA allocations for all local jurisdictions. Following extensive debate and public comment, SCAG’s Regional Council voted to approve the Draft RHNA Methodology on November 7, 2019 and provide it to HCD for review. Per Government Code 65584.04(i), HCD is vested with the authority to determine whether a methodology furthers the objectives set forth in Government Code section 65584(d). On January 13, 2020, HCD found that the Draft RHNA Methodology furthers these five statutory objectives of RHNA. Specifically, HCD noted that:

*“This methodology generally distributes more RHNA, particularly lower income RHNA, near jobs, transit, and resources linked to long term improvements of life outcomes.*

*In particular, HCD applauds the use of the objective factors specifically linked the statutory objectives in the existing need methodology.” (Letter from HCD to SCAG dated January 13, 2020 at <https://scag.ca.gov/sites/main/files/file-attachments/hcd-review-rc-approved-draft-rhna-methodology.pdf?1602190239>).*

On March 5, 2020, again following extensive debate and public comment, the Regional Council voted to approve the Draft RHNA Methodology as the Final RHNA Methodology. Unlike SCAG’s 5<sup>th</sup> cycle RHNA methodology which relies almost entirely on the household growth component of the RTP/SCS, SCAG’s 6<sup>th</sup> cycle RHNA methodology consists of two primary elements: “projected need” which includes the number of housing units required to accommodate anticipated population growth over the 8-year RHNA planning period and “existing need,” which refers to the number of housing units required to accommodate excess or unsatisfied housing demand experienced by the region’s current population.<sup>3</sup> Furthermore, the Final RHNA methodology utilizes measures of 2045 job accessibility and High Quality Transit Area (HQT) population measures based on TAZ-level projections in the Connect SoCal Growth Vision.

More specifically, the Final RHNA Methodology considers three primary factors in determining a local jurisdiction’s total housing need which are primarily based on data from Connect SoCal’s aforementioned Bottom-Up Local Input and Envisioning Process:

- Forecasted growth over 2020-2030 (projected need)
- Transit accessibility in 2045 (existing need)
- Job accessibility in 2045 (existing need)

The methodology is described in further detail at <http://scag.ca.gov/programs/Documents/RHNA/SCAG-Final-RHNA-Methodology-030520.pdf>.

### **3. Draft RHNA Allocation for the City of Cerritos**

Following the adoption of the Final RHNA Methodology on March 5, 2020 and the 120 day delay due to the COVID-19 pandemic, SCAG adopted Connect SoCal on September 3, 2020, and the City of Cerritos received its draft RHNA allocation on September 11, 2020. Application of the RHNA methodology yields the draft RHNA allocation for the City of Cerritos as summarized in the data and calculations in the tables below.

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<sup>3</sup> Legislative changes in 2018 modified the nature of the regional housing need determination for the 6<sup>th</sup> cycle of RHNA by adding measures of household overcrowding and housing cost burden to the list of factors to be considered by HCD for the determination of housing need. These new measures are not included in the Connect SoCal Growth Forecast because they are not direct inputs to the growth forecasting process and are independent of employment and population projections. In contrast, they reflect additional latent housing needs in the current population (i.e. “existing need”) and would not result in a change in regional population. For further discussion see Connect SoCal Master Response 1 at [https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal\\_Public-Participation-Appendix-2.pdf](https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal_Public-Participation-Appendix-2.pdf).

| <b>Cerritos city statistics and inputs:</b>  |           |
|--|-----------|
| Forecasted household (HH) growth, RHNA period:<br><i>(2020-2030 Household Growth * 0.825)</i>  | 33        |
| Percent of households who are renting:   | 21%       |
| Housing unit loss from demolition (2009-18):   | -         |
| Adjusted forecasted household growth, 2020-2045:<br><i>(Local input growth forecast total adjusted by the difference between the RHNA determination and SCAG's regional 2020-2045 forecast, +4%)</i> | 105       |
| Percent of regional jobs accessible in 30 mins (2045):<br><i>(For the jurisdiction's median TAZ)</i>   | 21.29%    |
| Jobs accessible from the jurisdiction's median TAZ (2045):<br><i>(Based on Connect SoCal's 2045 regional forecast of 10.049M jobs)</i>   | 2,139,000 |
| Share of region's job accessibility (population weighted):   | 0.39%     |
| Jurisdiction's HQTAs population (2045):  | 1,770     |
| Share of region's HQTAs population (2045):   | 0.02%     |
| Share of population in low/very low-resource tracts:   | 0.03%     |
| Share of population in very high-resource tracts:  | 77.47%    |
| Social equity adjustment:  | 160%      |

| Calculation of Draft RHNA Allocation for Cerritos city  |             |
|---|-------------|
| Forecasted household (HH) growth, RHNA period:  | 33          |
| Vacancy Adjustment<br><i>(5% for renter households and 1.5% for owner households)</i>   | 1           |
| Replacement Need  | -           |
| <b>TOTAL PROJECTED NEED:</b>  | <b>34</b>   |
| Existing need due to job accessibility (50%)  | 1636        |
| Existing need due to HQTAs pop. share (50%)   | 72          |
| Net residual factor for existing need<br><i>(Negative values reflect a cap on lower-resourced community with good job and/or transit access. Positive values represent this amount being redistributed to higher-resourced communities based on their job and/or transit access.)</i> | 161         |
| <b>TOTAL EXISTING NEED</b>  | <b>1870</b> |
| <b>TOTAL RHNA FOR CERRITOS CITY</b>   | <b>1903</b> |
| Very-low income (<50% of AMI)   | 678         |
| Low income (50-80% of AMI)  | 344         |
| Moderate income (80-120% of AMI)  | 331         |
| Above moderate income (>120% of AMI)  | 550         |

The transit accessibility measure is based on the population anticipated to live in High-Quality Transit Areas (HQTAs) in 2045 based on Connect SoCal’s designation of high-quality transit areas and population forecasts. With a forecasted 2045 population of 1,770 living within HQTAs, Cerritos represents 0.02% of the SCAG region’s HQTAs population, which is the basis for allocating housing units based on transit accessibility.

Job accessibility is defined as the jurisdiction’s share of regional jobs accessible within a 30-minute drive commute. Since over 80 percent of the region’s workers live and work in different jurisdictions, the RHNA methodology uses a measure based on Connect SoCal’s travel demand model output for the year 2045 rather than assigning housing units based on the number of jobs with a specific jurisdiction. Specifically, the share of future (2045) regional jobs which can be reached in a 30-minute

automobile commute from the local jurisdiction's median TAZ is used as to allocate housing units based on transit accessibility. From the City of Cerritos' median TAZ, it will be possible to reach 21.29% of the region's jobs in 2045 within a 30-minute automobile commute (2,139,000 jobs, based on Connect SoCal's 2045 regional job forecast of 10,049,000 jobs).

An additional factor is included in the methodology to account for RHNA Objective #5 to Affirmatively Further Fair Housing (AFFH). Several jurisdictions in the region which are considered disadvantaged communities (DACs) on the basis of access to opportunity measures (described further in the RHNA methodology document), but which also score highly in job and transit access, may have their total RHNA allocations capped based on their long-range (2045) household forecast. This additional housing need, referred to as residual, is then reallocated to non-DAC jurisdictions in order to ensure housing units are placed in higher-resourced communities consistent with AFFH principles. This reallocation is based on the job and transit access measures described above, and results in an additional 161 units assigned to the City of Cerritos.

Please note that the above represents only a partial description of key data and calculations which result in the draft RHNA allocation.

**Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form**  
*All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.*  
*Appeals and supporting documentation should be submitted to [housing@scaq.ca.gov](mailto:housing@scaq.ca.gov).*  
*Late submissions will not be accepted.*

Date: \_\_\_\_\_ Jurisdiction Subject to This Appeal Filing:  
 \_\_\_\_\_  
 (to file another appeal, please use another form)

Filing Party (Jurisdiction or HCD)  
 \_\_\_\_\_

Filing Party Contact Name \_\_\_\_\_ Filing Party Email: \_\_\_\_\_

**APPEAL AUTHORIZED BY:**

Name: \_\_\_\_\_

**PLEASE SELECT BELOW:**

- Mayor
- Chief Administrative Office
- City Manager
- Chair of County Board of Supervisors
- Planning Director
- Other: \_\_\_\_\_

**BASES FOR APPEAL**

- Application of the adopted Final RHNA Methodology for the 6<sup>th</sup> Cycle RHNA (2021-2029)
- Local Planning Factors and/or Information Related to Affirmatively Furthering Fair Housing (See Government Code Section 65584.04 (b)(2) and (e))
  - Existing or projected jobs-housing balance
  - Sewer or water infrastructure constraints for additional development
  - Availability of land suitable for urban development or for conversion to residential use
  - Lands protected from urban development under existing federal or state programs
  - County policies to preserve prime agricultural land
  - Distribution of household growth assumed for purposes of comparable Regional Transportation Plans
  - County-city agreements to direct growth toward incorporated areas of County
  - Loss of units contained in assisted housing developments
  - High housing cost burdens
  - The rate of overcrowding
  - Housing needs of farmworkers
  - Housing needs generated by the presence of a university campus within a jurisdiction
  - Loss of units during a state of emergency
  - The region's greenhouse gas emissions targets
  - Affirmatively furthering fair housing
- Changed Circumstances (Per Government Code Section 65584.05(b), appeals based on change of circumstance can only be made by the jurisdiction or jurisdictions where the change in circumstance occurred)

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_ Hearing Date: \_\_\_\_\_ Planner: \_\_\_\_\_

**Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form**  
*All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.*  
*Appeals and supporting documentation should be submitted to [housing@scaq.ca.gov](mailto:housing@scaq.ca.gov).*  
*Late submissions will not be accepted.*

**Brief statement on why this revision is necessary to further the intent of the objectives listed in Government Code Section 65584 (please refer to Exhibit C of the Appeals Guidelines):**

**Please include supporting documentation for evidence as needed, and attach additional pages if you need more room.**

**Brief Description of Appeal Request and Desired Outcome:**

**Number of units requested to be reduced or added to the jurisdiction's draft RHNA allocation (circle one):**

Reduced \_\_\_\_\_ Added \_\_\_\_\_

**List of Supporting Documentation, by Title and Number of Pages**  
**(Numbers may be continued to accommodate additional supporting documentation):**

- 1.
- 2.
- 3.

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_

Hearing Date: \_\_\_\_\_

Planner: \_\_\_\_\_



**City of Cerritos – Sixth Cycle RHNA Appeal Request Form**

**Date:** October 19, 2020

**Filing Party:** City of Cerritos

**Filing Party Contact Name:** Assistant City Attorney Pam K. Lee

**Filing Party Contact Email:** plee@awattorneys.com

**Appeal Authorized By:** Art Gallucci, City Manager

**SECTION 1: BASES FOR APPEAL**

- Application of the Adopted Final RHNA Methodology for the 6<sup>th</sup> Cycle RHNA (2021-2029)
- Local Planning Factors and/or Information Related to Affirmatively Furthering Fair Housing
  - Availability of land suitable for urban development or for conversion to residential use

**SECTION 2: BRIEF STATEMENT ON WHY THIS REVISION IS NECESSARY TO FURTHER THE INTENT OF THE OBJECTIVES LISTED IN GOVERNMENT CODE SECTION 65584.**

**I. Introduction**

SCAG's Draft Regional Housing Needs Assessment (RHNA) Allocation Plan (Draft RHNA Plan) formulated a RHNA methodology to determine each jurisdiction's RHNA allocation. The RHNA methodology consists of two main categories: (1) projected need and (2) existing need. Projected need is based on three factors: (i) projected household growth from 2020-2030, (ii) future vacancy need, and (iii) replacement need. The region's projected need is calculated to be 504,970 units. Based on the RHNA allocation to SCAG by the California Department of Housing and Community Development (HCD) of 1,341,827 units, the remaining 836,857 units constitute existing need. Per SCAG's RHNA methodology, existing need is based on two factors: (i) transit accessibility, and (ii) job accessibility.

The City of Cerritos (City) appeals the City's proposed allocated share of the regional housing need included as part of SCAG's Draft RHNA Plan. The City's draft allocation is 1903 units, and the City is requesting a reduction to **1774 units**. This revision is necessary to further the intent of the objectives listed in Government Code Section 65584(d) for the following reasons:

- A. The allocation fails to apply the adopted final RHNA methodology for the 6th Cycle RHNA, particularly with respect to existing need due to job accessibility.
- B. The allocation fails to apply the adopted final RHNA methodology, as the allocation percentages for each income category is incorrect, when based on the social equity adjustment formula.
- C. SCAG failed to consider local planning factors, namely the availability of land suitable for urban development or for conversion to residential use.

Finally, the City believes that HCD's RHNA determination for SCAG is incorrectly calculated, being twice as much as it should be. Due to Senate Bill 828 (2018), HCD's incorrect vacancy rate and double counting of existing need has resulted in a SCAG RHNA allocation

of 1,341,827 units, when it should have been allocated 651,000 units, which is much nearer the region's actual projected need of 504,970 units.

## II. Bases For Appeal

### A. The allocation fails to apply the adopted final RHNA methodology, particularly with respect to existing need due to job accessibility.

With respect to the region's existing housing need, SCAG's RHNA methodology assigns 50% of the need to job accessibility. According to SCAG:

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

*(SCAG Final RHNA Methodology, p. 10.)*

According to SCAG, job accessibility data are derived at the transportation analysis zone (TAZ) level from travel demand modelling output from SCAG's final Connect SoCal Plan. A jurisdiction's median TAZ was found to be the best available measure of job accessibility for that jurisdiction.

According to the RHNA methodology data, the City's median TAZ and percentage of regional jobs accessible within a 30-minute commute is 21.29%. This means that of all the available jobs within the SCAG region, 21.29% of those jobs are accessible to the average Cerritos resident within a 30-minute commute. (See attachments 1 and 2.)

The assignment of 21.29% of job accessibility to the City is erroneous for several reasons. First, SCAG estimated the City's 2016 employment data to be 38,953 jobs and a projected 2045 employment data of 39,183 jobs, which is approximately 4,350 jobs per square mile. This is reflected in the Connect SoCal Plan as 39,000 jobs in 2016 and 39,200 jobs in 2045. (See attachments 3 and 4.) Such employment density is only seen in highly industrialized or commercialized areas or within areas designated by Connect SoCal as "Job Centers". The City, however, is neither highly commercialized or industrialized and is not a designated "Job Center". The City is mostly made up of residential zones, with only a few small industrial parks. Although the City does have well-known commercial/retail areas such as the Los Cerritos Mall and the Cerritos Auto Square, such commercial areas are similar to the commercial areas within the surrounding communities (e.g., Lakewood Mall). Notably, all of the cities and communities surrounding the City of Cerritos have much lower employment densities of 1,000 to 2,500 jobs per square mile. (See attachments 5 and 6.)

In fact, the American Community Survey (ACS) 5-year estimate (2012-2016) indicates that the **City employed approximately 34,850 workers**, or roughly 3,900 jobs per square mile. (See attachment 7.) The City believes the ACS estimate reflects the City's true employment data, which is in line with the City's neighboring communities that have similar commercial, retail, industrial, and residential land use proportions. (See attachment 6.) Based on Connect SoCal Plan's 2016 projections, SCAG overestimated the number of jobs in the City by 4,103. (Compare attachments 3 and 7.) Because the Connect SoCal 2016 employment data was incorrect and overinflated to begin with, the 2045 projection is

consequently grossly overinflated as well, by at least 4,200 jobs, which is roughly 10.5% of the estimate.

Second, although the RHNA methodology for job accessibility is based on how many jobs can be accessed from a jurisdiction within a 30-minute commute, rather than how many jobs are located within a jurisdiction, the fact that SCAG and the Connect SoCal Plan so grossly overinflated the employment data within the City, such information necessarily adversely affects the job accessibility data within the City. If, according to SCAG and the Connect SoCal Plan, there are supposedly more jobs within the City, then more people within the City would be able to access those jobs with a commute time of less than 30 minutes. If, however, there are less jobs, as presented by accurate data from the ACS, then less jobs are accessible by people living within the City via a 30-minute commute.

Accordingly, the City’s assignment of 21.29% of job accessibility should be lowered to a more accurate and equitable percentage. If the percentage were lowered by 1.5% to 19.79% to reflect a reduction in approximately 4,200 jobs, then 9,907 people within the City would have 30-minute or less commutes to their jobs, or approximately 0.36% share of the region’s job accessibility (population weighted). That, in turn, would equal an assignment of **1507 units as existing need due to job accessibility** rather than the 1636 units originally assigned.

**B. The allocation fails to apply the adopted final RHNA methodology, as the allocation percentages for each income category is incorrect, when based on the social equity adjustment formula.**

In addition to the 150% social equity adjustment, the City was allocated an additional 10% adjustment due to significant populations that are defined as very low or very high resource areas, for a total of 160% social equity adjustment, or a factor of 1.6. In determining the jurisdiction’s income distribution by category, the percentage of the jurisdiction’s income distribution by category is compared to that of the county’s. According to the RHNA methodology, the formula to calculate an income category percentage is as follows:

Jurisdiction’s income distribution percentage – [(Jurisdiction’s income distribution percentage – County’s income distribution percentage) X social equity adjustment factor]

(SCAG Final RHNA Methodology, p. 14.)

The City’s existing household income distribution, compared with the County’s, is as follows:

| Existing Household Income Distribution |                  |           |
|--|------------------|-----------|
|  | City of Cerritos | LA County |
| Very Low Income                        | 12.6%            | 26.1%     |
| Low Income                             | 10.4%            | 15.2%     |
| Moderate Income                        | 13.9%            | 16.1%     |
| Above Moderate Income                  | 63.2%            | 42.6%     |

(SCAG Final RHNA Data Appendix)

Based on the formula, the City's income distribution by category, including the social equity adjustment factor of 1.6, should be as follows:

| Household Income Distribution with Social Equity Adjustment |                  |
|---|------------------|
|   | City of Cerritos |
| Very Low Income   | 34.2%            |
| Low Income  | 18.1%            |
| Moderate Income   | 17.5%            |
| Above Moderate Income                                       | 30.2%            |

However, SCAG stated that the regional final RHNA allocation plan must be the same as the regional determination, by income category, provided by HCD. So SCAG applied a "normalization adjustment" to the draft allocation to ensure the regional total by income category is consistent with HCD's allocation. This noticeably skewed the percentages and the number of units assigned to the City, as follows.

| SCAG's Household Income Distribution with Social Equity Adjustment + "Normalization Adjustment" |                  |
|---|------------------|
|   | City of Cerritos |
| Very Low Income   | 35.6%            |
| Low Income  | 18.1%            |
| Moderate Income   | 17.4%            |
| Above Moderate Income   | 28.9%            |

It is not clear from SCAG's Final RHNA methodology how it determined and assigned the "normalization adjustment", and whether all jurisdictions received a certain number or percentage of the residual unassigned units to align with HCD's allocation. Also, it is unclear whether the formulation of the "normalization adjustment" of the methodology was ever communicated to the jurisdictions or whether the jurisdictions were given an opportunity to comment prior to finalization of the final RHNA methodology.

Accordingly, the City requests that its distribution by income category be calculated utilizing the formula that was discussed, adopted, and implemented by SCAG, including the social equity adjustment factor of 1.6, as follows:

| City of Cerritos Household Income Distribution with Social Equity Adjustment |                    |                           |        |
|--|--------------------|---------------------------|--------|
|  | SCAG Determination | City's Proposed Revisions | Change |
| Very Low Income  | 35.6%              | <b>34.2%</b>              | -1.4%  |
| Low Income   | 18.1%              | <b>18.1%</b>              | 0%     |
| Moderate Income  | 17.4%              | <b>17.5%</b>              | +0.1%  |
| Above Moderate Income  | 28.9%              | <b>30.2%</b>              | +1.3%  |

This revision is more in line with what is provided for in Government Code Section 65584(d)(4).

C. **SCAG failed to consider local planning factors, namely the availability of land suitable for urban development or for conversion to residential use.**

Most of the City, which was incorporated in 1956, has been built out and developed, with very few vacant sites that are suitable for land development within the City. The City has a vibrant and well-planned mix of residential, commercial, and industrial uses. Most of the existing residential uses are single family homes and parcels, with several multi-family residential uses. The existing commercial and industrial uses are mostly occupied with fairly low vacancy rates.

SCAG had previously identified 8 sites within the City of Cerritos, as reflected in the City's 2013-2021 Housing Element, as suitable for development, specifically potential housing development. (See attachment 8.) However, all but one of the sites identified as vacant or refill/infill parcels by SCAG have either (i) approved plans for further development as other uses, (ii) already have "inhabitable structures or buildings" as defined by SCAG Data/Map book, or (iii) are roadway infrastructure parcels that are unable to be developed. The remaining site continues to be potential refill/infill parcels suitable for reuse as a housing development. (See attachment 9.)

There are very few under-utilized parcels within the City. Thus, it would be difficult for the City to convert such parcels for residential uses without displacement of current residents from their homes or revenue-generating businesses and without the loss of existing jobs to accommodate additional housing.

Furthermore, the City anticipates that the rising popularity of e-commerce, coupled with the displacement of existing commercial, office, and industrial uses to accommodate housing will negatively impact job growth within the City and will invariably lead to a net reduction in employment within the City over the next several decades to 2045. This factor needs serious consideration in order for meaningful development of housing to actually occur, not just within the City, but within the region as a whole.

Accordingly, the City requests that its allocation be revised downward to reflect this local planning factor and constraint on development of housing, as previously identified above in Section II(B).

**III. These Revisions Further The Government Objectives Under Government Code Section 65584.**

The City's proposed revisions above serve to further the five RHNA objectives under Government Code Section 65584(d), more so than the current allocation. With respect to the first objective of increasing the housing supply and mix of housing types, tenure, and affordability within the region in an equitable manner, the City's proposed revisions ensure that the consideration of actual employment data and projections (as opposed to output modelling) promotes an equitable distribution of housing where the jobs are accessible. It is clear that job accessibility has been overinflated with SCAG's Connect SoCal Plan, so placement of housing where there are not as many accessible jobs as originally calculated does not achieve equity or distributes housing in an equitable manner in any way to the City or to the surrounding communities whose residents may commute to the City. Rather, revising the City's share of the region's job accessibility (population-weighted) downward from 21.29% to 19.79% will increase the supply of housing in a more equitable and realistic manner. Also, the distribution of income categories as revised by the City actually promotes social equity based on the formula promulgated and adopted by SCAG.

With respect to the second objective, the proposed revisions encourage efficient development patterns and achieve the region's greenhouse gas targets better than the current allocation, because the revisions are more accurate in reflecting actual travel patterns and demands between jobs and housing. By continuing to use the current allocation, the City's residents will actually be travelling farther to access the number of jobs purported to exist within the City (which they do not). This, in turn actually increases the use of greenhouse gas from the increased commute time. With the revisions, the number of housing units that will be built will accurately reflect the actual existing and projected number of jobs between now and the end of the planning period that are accessible within a 30-minute commute, and it will provide a reduction in trips and greenhouse gases.

With respect to the third objective, the proposed revisions will promote an improved intraregional relationship between jobs and housing, as the more accurate data and projections will lead to more housing closer to where the jobs are or will be located. Using the current projections overinflates the number of jobs in or near the City and will create housing that is not necessarily near where the jobs will be located.

With respect to the fourth and fifth objectives, the revisions, and particularly the proposed distribution of income categories, will allocate the appropriate percentage and number of housing per income category that will promote social equity within the City by strictly using the formula created and implemented by SCAG. This will also affirmatively further fair housing by giving the City the correct percentage and number of very-low and low income units.

Overall, the City's proposed revisions are necessary to ensure success in planning for and actually developing housing to meet the needs and demands of the future. Denying the appeal and moving forward with the allocation as-is would ignore the actual real world constraints on employment and development that exists within the City and the surrounding communities. The City's proposed revisions also further the housing objectives in a more meaningful way by adhering to the RHNA methodology while incorporating actual data and information as well as promoting social equity.

#### **IV. Additional Issues**

HCD improperly calculated the wrong RHNA allocation and gave SCAG twice as many housing units than it should have. SB 828, which made changes to Government Code Sections 65584, 65584.01, and 65584.04, wrongly assumed overcrowding and cost-burdening were not considered in the housing needs projections calculated by the California Department of Finance (DOF), which (prior to SB 828) was tasked with developing methodology for household forecasts. According to a report by the Embarcadero Institute, *Double Counting in the Latest Housing Needs Assessment*, September 2020, "unknown to the authors of SB-828, the DOF has for years factored overcrowding and cost-burdening into their household projections. These projections are developed by multiplying the estimated population by the headship rate (the proportion of the population who will be head of a household). The DOF, in conjunction with HCD, has documented its deliberate decision to use higher headship rates to reflect optimal conditions and intentionally "alleviate the burdens of high housing cost and overcrowding." Unfortunately, SB-828 has caused the state to double count these important numbers." (See attachment 10, *Double Counting in the Latest Housing Needs Assessment*, p. 3.) In other words, the resulting legislation of SB 828 counted overcrowding and high housing costs twice, once as part of the household projections when multiplying estimated population by the headship rate, and then again a second time as an adjustment factor. This has resulted in an additional 734,000 housing units being assigned to regional planning bodies throughout California,

with SCAG absorbing a vast majority of the units. (See attachment 10, *Double Counting in the Latest Housing Needs Assessment*, p. 4.)

Moreover, SB 828 assumed a 5% vacant rate in owner-occupied housing is representative of a healthy housing market, when in fact, the rate should be 1.5%. As a result, more housing units would be required to be built to achieve a higher 5% vacancy rate for owner-occupied housing. This will result in an oversupply of such housing. The Embarcadero Institute estimates this error results in an overproduction requirement of 229,000 housing units throughout California, the majority of which was again assigned to SCAG. (See attachment 10, *Double Counting in the Latest Housing Needs Assessment*, pp. 3-4.)

Overall, the double counting has required regional planning bodies throughout California to absorb over 941,000 additional housing units than it would have otherwise been required to produce, with SCAG being assigned to produce 691,000 of those units, which is 100% more than the actual projected household growth for the Southern California region.

### **SECTION 3: BRIEF DESCRIPTION OF APPEAL REQUEST AND DESIRED OUTCOME**

1. Reduce the City's share of the region's job accessibility (populated weighted) from 21.29% to 19.79%, thereby reducing the City's allocation from 1903 to 1774 units.
2. Redistribute the City's allocated income categories from 35.6% for very-low income, 18.1% for low income, 17.4% for moderate income, and 28.9% for above moderate income to 34.2% for very-low income, 18.1% for low income, 17.5% for moderate income, and 30.2% for above moderate income.

### **SECTION 4: NUMBER OF UNITS REQUESTED TO BE REDUCED OR ADDED TO THE JURISDICTION'S DRAFT RHNA ALLOCATION:**

Reduced: 129 units

### **SECTION 5: LIST OF SUPPORTING DOCUMENTATION, BY TITLE AND NUMBER OF PAGES:**

1. SCAG Final RHNA Methodology Worksheet (City of Cerritos), September 3, 2020
2. SCAG Final RHNA Data Appendix: Job Accessibility (City of Cerritos), March 5, 2020
3. SCAG Final RHNA Data Appendix: Number of Jobs (City of Cerritos), March 5, 2020
4. Connect SoCal Plan, Demographics & Growth Forecast Technical Report, p. 33.
5. Connect SoCal Plan, Demographics & Growth Forecast Technical Report, p. 33-35, 37.
6. Connect SoCal Plan, Demographics & Growth Forecast Technical Report, Exhibit 7.
7. American Community Survey 2012-2016 5-year estimates for workers within a workplace (City of Cerritos)
8. City of Cerritos 2013-2021 Housing Element – Potential Housing Sites
9. City of Cerritos potential refill-infill parcels (submitted to SCAG), September 2018
10. *Double Counting in the Latest Housing Needs Assessment*, September 2020, Gab Layton, Embarcadero Institute

SCAG 6TH CYCLE DRAFT RHNA ALLOCATION BASED ON FINAL RHNA METHODOLOGY

9/3/20

**What is this?** This spreadsheet tool provides input data as well as draft RHNA allocations for each local jurisdiction. Following the adoption of Connect SoCal (2020 RTP/SCS) by SCAG's Regional Council on 9/4/2020, draft allocations were formally issued to each local jurisdiction.

**Instructions:** Select jurisdiction from drop-down menu. Green boxes will populate based on data in "RHNA\_data" tab. For more information, please see [www.scag.ca.gov/rhna](http://www.scag.ca.gov/rhna) or email [housing@scag.ca.gov](mailto:housing@scag.ca.gov).

Select Jurisdiction (drop-down menu)  
**Cerritos city**

Total regional housing need  
**1,341,827**

| Cerritos city statistics:                             |        | Regional Percentile: |
|---|--------|----------------------|
| Forecasted household (HH) growth, RHNA period:        | 33     | 9%                   |
| Percent of households who are renting:                | 21%    | 8%                   |
| Housing unit loss from demolition (2009-18):          | -      | 0%                   |
| Adj. forecasted household growth, 2020-2045:*         | 105    | -                    |
| Pct. of regional jobs accessible in 30 mins (2045):** | 21.29% | 96%                  |
| Share of region's job accessibility (pop-weighted):   | 0.39%  | 71%                  |
| Share of region's HQTa population (2045)              | 0.02%  | 35%                  |
| Share of pop. in low/very low-resource tracts:        | 0.03%  | -                    |
| Share of pop. In very high-resource tracts:           | 77.47% | -                    |
| Social equity adjustment:                             | 160%   | -                    |

\*Local input/growth forecast total adjusted by the difference between the RHNA determination and SCAG's regional 2020-2045 forecast (+4%)  
 \*\*For the jurisdiction's median TAZ

For complete descriptions of values below, see "metadata" tab or [www.scag.ca.gov/rhna](http://www.scag.ca.gov/rhna)

| RHNA Allocation inputs for Cerritos city       |             |                     |
|--|-------------|---------------------|
| Forecasted household (HH) growth, RHNA period: | 33          |                     |
| Vacancy Adjustment                             | 1           |                     |
| Replacement Need                               | -           |                     |
| <b>TOTAL PROJECTED NEED:</b>                   | <b>34</b>   |                     |
| Existing need due to job accessibility (50%)   | 1636        |                     |
| Existing need due to HQTa pop. share (50%)     | 72          |                     |
| Net residual factor for existing need^         | 161         |                     |
| <b>TOTAL EXISTING NEED</b>                     | <b>1870</b> |                     |
| <b>TOTAL RHNA FOR CERRITOS CITY</b>            | <b>1903</b> |                     |
|  |             | <i>Pct of total</i> |
| Very-low income (<50% of AMI)                  | 678         | 35.6%               |
| Low income (50-80% of AMI)                     | 344         | 18.1%               |
| Moderate income (80-120% of AMI)               | 331         | 17.4%               |
| Above moderate income (>120% of AMI)           | 550         | 28.9%               |

^Negative values represent a lower-resourced community with good job and/or transit access having its allocation capped. Positive values represent this amount being redistributed to higher-resourced communities based on their job and/or transit access.



| County         | Subregion               | City                    | FIPS  | Population (2045) | % of jobs accessible in SCAG | Job accessibility, population-weighted | Share of region's job accessibility | Job accessibility factor |
|----------------|-------------------------|-------------------------|-------|-------------------|------------------------------|--|-------------------------------------|--------------------------|
| San Bernardino | SBCTASBCOG              | Adeanto city            | 296   | 66,637            | 1.51%                        | 1006                                   | 0.04%                               | 154                      |
| Los Angeles    | Las Virgenes Malibu COG | Ajoura hills            | 394   | 22,354            | 4.62%                        | 1033                                   | 0.04%                               | 159                      |
| Los Angeles    | SGVCOG                  | Alhambra city           | 884   | 91,215            | 15.85%                       | 14453                                  | 0.53%                               | 2218                     |
| Orange         | OCCOG                   | Aliso Viejo city        | 947   | 52,657            | 9.44%                        | 4968                                   | 0.18%                               | 763                      |
| Orange         | OCCOG                   | Anaheim city            | 2000  | 416,789           | 20.89%                       | 87067                                  | 3.19%                               | 13364                    |
| San Bernardino | SBCTASBCOG              | Apple Valley town       | 2364  | 101,405           | 1.50%                        | 1521                                   | 0.06%                               | 233                      |
| Los Angeles    | SGVCOG                  | Arcadia city            | 2462  | 62,206            | 10.40%                       | 6469                                   | 0.24%                               | 993                      |
| Los Angeles    | GCCOG                   | Artesia city            | 2896  | 17,751            | 21.61%                       | 3836                                   | 0.14%                               | 589                      |
| Los Angeles    | GCCOG                   | Avalon city             | 3274  | 4,143             | 0.00%                        | 0                                      | 0.00%                               | 0                        |
| Los Angeles    | SGVCOG                  | Azusa city              | 3386  | 56,204            | 9.04%                        | 5081                                   | 0.19%                               | 780                      |
| Los Angeles    | SGVCOG                  | Baldwin Park city       | 3666  | 81,691            | 12.03%                       | 9827                                   | 0.36%                               | 1508                     |
| Riverside      | WRCCOG                  | Banning city            | 3820  | 41,469            | 2.09%                        | 867                                    | 0.03%                               | 133                      |
| San Bernardino | SBCTASBCOG              | Barstow city            | 4030  | 36,874            | 0.28%                        | 103                                    | 0.00%                               | 16                       |
| Riverside      | WRCCOG                  | Beaumont city           | 4758  | 80,171            | 3.15%                        | 2525                                   | 0.09%                               | 388                      |
| Los Angeles    | GCCOG                   | Bell city               | 4870  | 37,070            | 18.07%                       | 6699                                   | 0.25%                               | 1028                     |
| Los Angeles    | GCCOG                   | Bell Gardens city       | 4996  | 44,337            | 19.56%                       | 8672                                   | 0.32%                               | 1331                     |
| Los Angeles    | GCCOG                   | Bellflower city         | 4982  | 77,046            | 22.44%                       | 17289                                  | 0.63%                               | 2654                     |
| Los Angeles    | WCCOG                   | Beverly Hills city      | 6308  | 35,832            | 17.74%                       | 6355                                   | 0.23%                               | 975                      |
| San Bernardino | SBCTASBCOG              | Big Bear Lake city      | 6434  | 6,569             | 0.09%                        | 6                                      | 0.00%                               | 1                        |
| Riverside      | CVAG                    | Blythe city             | 7218  | 28,622            | 0.07%                        | 20                                     | 0.00%                               | 3                        |
| Los Angeles    | SGVCOG                  | Bradbury city           | 7946  | 1,140             | 10.50%                       | 120                                    | 0.00%                               | 18                       |
| Imperial       | ICTCINAVAG              | Brawley city            | 8058  | 41,125            | 1.22%                        | 502                                    | 0.02%                               | 77                       |
| Orange         | OCCOG                   | Brea city               | 8100  | 48,034            | 16.37%                       | 7863                                   | 0.29%                               | 1207                     |
| Orange         | OCCOG                   | Buena Park city         | 8786  | 96,187            | 20.08%                       | 19314                                  | 0.71%                               | 2964                     |
| Los Angeles    | Arroyo Verdugo          | Burbank city            | 8954  | 115,430           | 12.36%                       | 14261                                  | 0.52%                               | 2189                     |
| Los Angeles    | Las Virgenes Malibu COG | Calabasas city          | 9598  | 24,939            | 4.86%                        | 1212                                   | 0.04%                               | 186                      |
| Imperial       | ICTCINAVAG              | Calxico city            | 9710  | 67,529            | 1.22%                        | 824                                    | 0.03%                               | 126                      |
| Riverside      | WRCCOG                  | Calimesa city           | 9864  | 20,554            | 4.04%                        | 830                                    | 0.03%                               | 127                      |
| Imperial       | ICTCINAVAG              | Calipatria city         | 9878  | 9,684             | 0.23%                        | 22                                     | 0.00%                               | 3                        |
| Ventura        | VCOG                    | Camardillo city         | 10046 | 76,093            | 3.82%                        | 2907                                   | 0.11%                               | 446                      |
| Riverside      | WRCCOG                  | Canyon Lake city        | 10928 | 11,427            | 2.55%                        | 291                                    | 0.01%                               | 45                       |
| Los Angeles    | SBCCOG                  | Carson city             | 11530 | 105,169           | 17.96%                       | 18888                                  | 0.69%                               | 2899                     |
| Riverside      | CVAG                    | Cathedral City city     | 12048 | 76,277            | 2.56%                        | 1953                                   | 0.07%                               | 300                      |
| Los Angeles    | GCCOG                   | Cerritos city           | 12552 | 50,062            | 21.29%                       | 10658                                  | 0.39%                               | 1636                     |
| San Bernardino | SBCTASBCOG              | Chino city              | 13210 | 121,345           | 11.68%                       | 14173                                  | 0.52%                               | 2175                     |
| San Bernardino | SBCTASBCOG              | Chino Hills city        | 13214 | 92,822            | 9.78%                        | 9078                                   | 0.33%                               | 1393                     |
| Los Angeles    | SGVCOG                  | Claremont city          | 13756 | 39,844            | 9.85%                        | 3925                                   | 0.14%                               | 602                      |
| Riverside      | CVAG                    | Coachella city          | 14260 | 129,288           | 1.83%                        | 2366                                   | 0.09%                               | 363                      |
| San Bernardino | SBCTASBCOG              | Colton city             | 14890 | 70,710            | 11.80%                       | 8344                                   | 0.31%                               | 1281                     |
| Los Angeles    | GCCOG                   | Commerce city           | 14974 | 13,759            | 23.31%                       | 3207                                   | 0.12%                               | 492                      |
| Los Angeles    | GCCOG                   | Compton city            | 15044 | 103,076           | 18.41%                       | 18976                                  | 0.70%                               | 2913                     |
| Riverside      | WRCCOG                  | Corona city             | 16350 | 185,073           | 8.30%                        | 15361                                  | 0.56%                               | 2358                     |
| Orange         | OCCOG                   | Costa Mesa city         | 16532 | 123,747           | 18.44%                       | 22813                                  | 0.84%                               | 3501                     |
| Los Angeles    | SGVCOG                  | Covina city             | 16742 | 50,547            | 10.36%                       | 5237                                   | 0.19%                               | 804                      |
| Los Angeles    | GCCOG                   | Cudahy city             | 17498 | 25,551            | 16.94%                       | 4327                                   | 0.16%                               | 664                      |
| Los Angeles    | WCCOG                   | Culver City city        | 17568 | 41,573            | 20.64%                       | 8581                                   | 0.31%                               | 1317                     |
| Orange         | OCCOG                   | Cypress city            | 17750 | 51,299            | 21.03%                       | 10788                                  | 0.40%                               | 1656                     |
| Orange         | OCCOG                   | Dana Point city         | 17946 | 35,622            | 3.91%                        | 1393                                   | 0.05%                               | 214                      |
| Riverside      | CVAG                    | Desert Hot Springs city | 18996 | 61,014            | 1.83%                        | 1117                                   | 0.04%                               | 171                      |
| Los Angeles    | SGVCOG                  | Diamond Bar city        | 19192 | 64,663            | 12.20%                       | 7886                                   | 0.29%                               | 1210                     |
| Los Angeles    | GCCOG                   | Downey city             | 19766 | 119,207           | 20.94%                       | 24956                                  | 0.92%                               | 3830                     |
| Los Angeles    | SGVCOG                  | Duarte city             | 19990 | 25,098            | 11.51%                       | 2889                                   | 0.11%                               | 443                      |
| Riverside      | WRCCOG                  | Eastvale city           | 21230 | 72,678            | 12.37%                       | 8990                                   | 0.33%                               | 1380                     |

| county | city                | HO16   | HO20   | HO30   | HO45   | E16    | E20    |
|--------|---------------------|--------|--------|--------|--------|--------|--------|
| 71     | Adelanto city       | 8159   | 9503   | 13686  | 19802  | 6141   | 6671   |
| 37     | Agoura Hills city   | 7436   | 7496   | 7656   | 7916   | 13570  | 13860  |
| 37     | Alhambra city       | 29910  | 30304  | 31070  | 32031  | 37370  | 37861  |
| 59     | Aliso Viejo city    | 18710  | 19542  | 19599  | 19704  | 23032  | 23568  |
| 59     | Anaheim city        | 101098 | 105927 | 110666 | 122701 | 197153 | 200992 |
| 71     | Apple Valley town   | 24734  | 26809  | 31547  | 37386  | 18012  | 19678  |
| 37     | Arcadia city        | 19563  | 20219  | 21128  | 22390  | 32620  | 33146  |
| 37     | Artesia city        | 4536   | 4620   | 4784   | 4956   | 6055   | 6134   |
| 37     | Avalon city         | 1444   | 1455   | 1484   | 2145   | 2570   | 2609   |
| 37     | Azusa city          | 13417  | 13832  | 14889  | 16366  | 19378  | 19782  |
| 37     | Baldwin Park city   | 16881  | 17311  | 18161  | 19234  | 24731  | 25023  |
| 65     | Banning city        | 10898  | 11418  | 13226  | 16144  | 7291   | 8139   |
| 71     | Barstow city        | 8417   | 9030   | 10560  | 12848  | 11704  | 12642  |
| 65     | Beaumont city       | 14221  | 16692  | 21168  | 25052  | 9278   | 10998  |
| 37     | Bell city           | 8945   | 8994   | 9093   | 9214   | 12382  | 12516  |
| 37     | Bellflower city     | 23244  | 23269  | 23306  | 23425  | 17583  | 17687  |
| 37     | Bell Gardens city   | 9652   | 9732   | 9931   | 10216  | 9579   | 9683   |
| 37     | Beverly Hills city  | 14840  | 14979  | 15296  | 15676  | 74550  | 75686  |
| 71     | Big Bear Lake city  | 2095   | 2194   | 2442   | 2813   | 4683   | 4833   |
| 65     | Blythe city         | 4594   | 4907   | 5413   | 6281   | 4766   | 5185   |
| 37     | Bradbury city       | 368    | 371    | 390    | 400    | 152    | 155    |
| 25     | Brawley city        | 7659   | 8849   | 10274  | 12831  | 8035   | 9358   |
| 59     | Brea city           | 15343  | 15908  | 16059  | 17035  | 50426  | 52506  |
| 59     | Buena Park city     | 24190  | 24661  | 26431  | 28564  | 33597  | 34477  |
| 37     | Burbank city        | 41874  | 42764  | 45219  | 48640  | 113992 | 116547 |
| 37     | Calabasas city      | 8788   | 9008   | 9184   | 9288   | 20471  | 20556  |
| 25     | Calexico city       | 10009  | 16118  | 19197  | 22293  | 10799  | 12406  |
| 65     | Calimesa city       | 3438   | 4009   | 6241   | 10409  | 1571   | 2223   |
| 25     | Calipatria city     | 981    | 1295   | 1468   | 1748   | 1753   | 1873   |
| 111    | Camarillo city      | 25168  | 26666  | 27443  | 28088  | 32674  | 33713  |
| 65     | Canyon Lake city    | 3879   | 3948   | 4048   | 4197   | 1802   | 2016   |
| 37     | Carson city         | 25462  | 26298  | 28166  | 30668  | 63367  | 64520  |
| 65     | Cathedral City city | 17362  | 19380  | 22569  | 27989  | 12283  | 13783  |
| 37     | Cerritos city       | 15467  | 15467  | 15507  | 15568  | 38953  | 38975  |
| 71     | Chino city          | 23227  | 24586  | 27983  | 33078  | 50408  | 51376  |
| 71     | Chino Hills city    | 23838  | 24418  | 25868  | 28043  | 16424  | 16633  |
| 37     | Claremont city      | 11763  | 12127  | 12803  | 13743  | 18794  | 19012  |
| 65     | Coachella city      | 9623   | 14396  | 21654  | 36439  | 8885   | 12484  |
| 71     | Colton city         | 15026  | 16080  | 19002  | 21668  | 19453  | 20764  |
| 37     | Commerce city       | 3385   | 3447   | 3545   | 3684   | 53367  | 53865  |
| 37     | Compton city        | 23502  | 23682  | 24081  | 24646  | 28564  | 28859  |
| 65     | Corona city         | 46932  | 47358  | 49407  | 52444  | 79227  | 81271  |
| 59     | Costa Mesa city     | 40538  | 41984  | 42465  | 44185  | 95713  | 99056  |
| 37     | Covina city         | 15971  | 16052  | 16452  | 16795  | 26326  | 26755  |
| 37     | Cudahy city         | 5649   | 5701   | 5870   | 6080   | 2886   | 3023   |
| 37     | Culver City city    | 17004  | 17146  | 17505  | 18014  | 59266  | 60312  |

| E30    | E45    | HO16  | HO20  | HO30  | HO45  | E16   | E20   | E30   |
|--------|--------|-------|-------|-------|-------|-------|-------|-------|
| 8005   | 10007  | 0.14% | 0.15% | 0.20% | 0.26% | 0.07% | 0.08% | 0.09% |
| 14293  | 15273  | 0.12% | 0.12% | 0.11% | 0.10% | 0.16% | 0.16% | 0.15% |
| 38790  | 40634  | 0.50% | 0.48% | 0.45% | 0.42% | 0.45% | 0.44% | 0.42% |
| 23972  | 24238  | 0.31% | 0.31% | 0.28% | 0.26% | 0.27% | 0.27% | 0.26% |
| 220681 | 250544 | 1.68% | 1.67% | 1.60% | 1.61% | 2.35% | 2.31% | 2.37% |
| 23871  | 30160  | 0.41% | 0.42% | 0.46% | 0.49% | 0.21% | 0.23% | 0.26% |
| 34122  | 36077  | 0.33% | 0.32% | 0.31% | 0.29% | 0.39% | 0.38% | 0.37% |
| 6276   | 6563   | 0.08% | 0.07% | 0.07% | 0.06% | 0.07% | 0.07% | 0.07% |
| 2687   | 2819   | 0.02% | 0.02% | 0.02% | 0.03% | 0.03% | 0.03% | 0.03% |
| 20487  | 21846  | 0.22% | 0.22% | 0.22% | 0.21% | 0.23% | 0.23% | 0.22% |
| 25514  | 26531  | 0.28% | 0.27% | 0.26% | 0.25% | 0.29% | 0.29% | 0.27% |
| 9847   | 11404  | 0.18% | 0.18% | 0.19% | 0.21% | 0.09% | 0.09% | 0.11% |
| 14990  | 18516  | 0.14% | 0.14% | 0.15% | 0.17% | 0.14% | 0.15% | 0.16% |
| 13600  | 15914  | 0.24% | 0.26% | 0.31% | 0.33% | 0.11% | 0.13% | 0.15% |
| 12707  | 13187  | 0.15% | 0.14% | 0.13% | 0.12% | 0.15% | 0.14% | 0.14% |
| 17898  | 18308  | 0.39% | 0.37% | 0.34% | 0.31% | 0.21% | 0.20% | 0.19% |
| 9876   | 10289  | 0.16% | 0.15% | 0.14% | 0.13% | 0.11% | 0.11% | 0.11% |
| 77596  | 81277  | 0.25% | 0.24% | 0.22% | 0.21% | 0.89% | 0.87% | 0.83% |
| 5207   | 5768   | 0.03% | 0.03% | 0.04% | 0.04% | 0.06% | 0.06% | 0.06% |
| 5865   | 6347   | 0.08% | 0.08% | 0.08% | 0.08% | 0.06% | 0.06% | 0.06% |
| 155    | 155    | 0.01% | 0.01% | 0.01% | 0.01% | 0.00% | 0.00% | 0.00% |
| 10858  | 13558  | 0.13% | 0.14% | 0.15% | 0.17% | 0.10% | 0.11% | 0.12% |
| 53711  | 54436  | 0.26% | 0.25% | 0.23% | 0.22% | 0.60% | 0.60% | 0.58% |
| 35805  | 38157  | 0.40% | 0.39% | 0.38% | 0.37% | 0.40% | 0.40% | 0.38% |
| 128658 | 138711 | 0.70% | 0.68% | 0.65% | 0.64% | 1.36% | 1.34% | 1.38% |
| 20656  | 20798  | 0.15% | 0.14% | 0.13% | 0.12% | 0.24% | 0.24% | 0.22% |
| 16632  | 20834  | 0.17% | 0.25% | 0.28% | 0.29% | 0.13% | 0.14% | 0.18% |
| 3289   | 4066   | 0.06% | 0.06% | 0.09% | 0.14% | 0.02% | 0.03% | 0.04% |
| 2527   | 3009   | 0.02% | 0.02% | 0.02% | 0.02% | 0.02% | 0.02% | 0.03% |
| 35111  | 37504  | 0.42% | 0.42% | 0.40% | 0.37% | 0.39% | 0.39% | 0.38% |
| 2347   | 2605   | 0.06% | 0.06% | 0.06% | 0.05% | 0.02% | 0.02% | 0.03% |
| 66325  | 70035  | 0.42% | 0.42% | 0.41% | 0.40% | 0.76% | 0.74% | 0.71% |
| 16181  | 18040  | 0.29% | 0.31% | 0.33% | 0.37% | 0.15% | 0.16% | 0.17% |
| 39041  | 39183  | 0.26% | 0.24% | 0.22% | 0.20% | 0.46% | 0.45% | 0.42% |
| 53796  | 57425  | 0.39% | 0.39% | 0.41% | 0.43% | 0.60% | 0.59% | 0.58% |
| 17156  | 17940  | 0.40% | 0.39% | 0.37% | 0.37% | 0.20% | 0.19% | 0.18% |
| 19419  | 20220  | 0.20% | 0.19% | 0.19% | 0.18% | 0.22% | 0.22% | 0.21% |
| 18448  | 23538  | 0.16% | 0.23% | 0.31% | 0.48% | 0.11% | 0.14% | 0.20% |
| 24035  | 28958  | 0.25% | 0.25% | 0.28% | 0.28% | 0.23% | 0.24% | 0.26% |
| 54531  | 56038  | 0.06% | 0.05% | 0.05% | 0.05% | 0.64% | 0.62% | 0.59% |
| 29266  | 30215  | 0.39% | 0.37% | 0.35% | 0.32% | 0.34% | 0.33% | 0.31% |
| 84480  | 92776  | 0.78% | 0.75% | 0.72% | 0.69% | 0.94% | 0.93% | 0.91% |
| 102506 | 103969 | 0.67% | 0.66% | 0.61% | 0.58% | 1.14% | 1.14% | 1.10% |
| 27462  | 28863  | 0.27% | 0.25% | 0.24% | 0.22% | 0.31% | 0.31% | 0.30% |
| 3023   | 3023   | 0.09% | 0.09% | 0.09% | 0.08% | 0.03% | 0.03% | 0.03% |
| 61635  | 64071  | 0.28% | 0.27% | 0.25% | 0.24% | 0.71% | 0.69% | 0.66% |

**TABLE 14 Jurisdiction-Level Growth Forecast**

| County      | Jurisdiction       | Population |         | Households |        | Employment |         |
|-------------|--------------------|------------|---------|------------|--------|------------|---------|
|             |                    | 2016       | 2045    | 2016       | 2045   | 2016       | 2045    |
| Imperial    | Brawley city       | 26,800     | 41,100  | 7,700      | 12,800 | 8,000      | 13,600  |
| Imperial    | Calexico city      | 40,800     | 67,500  | 10,000     | 22,300 | 10,800     | 20,800  |
| Imperial    | Calipatria city    | 7,500      | 9,700   | 1,000      | 1,700  | 1,800      | 3,000   |
| Imperial    | El Centro city     | 45,500     | 58,800  | 13,100     | 20,500 | 23,200     | 48,100  |
| Imperial    | Holtville city     | 6,200      | 7,700   | 1,800      | 2,600  | 1,800      | 2,800   |
| Imperial    | Imperial city      | 18,400     | 27,800  | 5,100      | 10,100 | 4,600      | 11,600  |
| Imperial    | Westmorland city   | 2,300      | 2,400   | 600        | 600    | 300        | 300     |
| Imperial    | Unincorporated     | 39,700     | 66,200  | 10,700     | 21,800 | 16,400     | 29,900  |
| Los Angeles | Agoura Hills city  | 21,000     | 22,400  | 7,400      | 7,900  | 13,600     | 15,300  |
| Los Angeles | Alhambra city      | 86,600     | 91,200  | 29,900     | 32,000 | 37,400     | 40,600  |
| Los Angeles | Arcadia city       | 57,300     | 62,200  | 19,600     | 22,400 | 32,600     | 36,100  |
| Los Angeles | Artesia city       | 16,800     | 17,800  | 4,500      | 5,000  | 6,100      | 6,600   |
| Los Angeles | Avalon city        | 3,700      | 4,100   | 1,400      | 2,100  | 2,600      | 2,800   |
| Los Angeles | Azusa city         | 49,600     | 56,200  | 13,400     | 16,400 | 19,400     | 21,800  |
| Los Angeles | Baldwin Park city  | 75,400     | 81,700  | 16,900     | 19,200 | 24,700     | 26,500  |
| Los Angeles | Bell city          | 36,400     | 37,100  | 8,900      | 9,200  | 12,400     | 13,200  |
| Los Angeles | Bellflower city    | 76,700     | 77,000  | 23,200     | 23,400 | 17,600     | 18,300  |
| Los Angeles | Bell Gardens city  | 42,800     | 44,300  | 9,700      | 10,200 | 9,600      | 10,300  |
| Los Angeles | Beverly Hills city | 34,700     | 35,800  | 14,800     | 15,700 | 74,600     | 81,300  |
| Los Angeles | Bradbury city      | 1,100      | 1,100   | 400        | 400    | 200        | 200     |
| Los Angeles | Burbank city       | 105,000    | 115,400 | 41,900     | 48,600 | 114,000    | 138,700 |
| Los Angeles | Calabasas city     | 24,200     | 24,900  | 8,800      | 9,300  | 20,500     | 20,800  |
| Los Angeles | Carson city        | 93,600     | 105,200 | 25,500     | 30,700 | 63,400     | 70,000  |
| Los Angeles | Cerritos city      | 49,700     | 50,100  | 15,500     | 15,600 | 39,000     | 39,200  |
| Los Angeles | Claremont city     | 36,200     | 39,800  | 11,800     | 13,700 | 18,800     | 20,200  |

Attachment: Appeal Form and Supporting Documentation (City of Cerritos) (Appeal of the Draft RHNA

**TABLE 14 Jurisdiction-Level Growth Forecast**

| County      | Jurisdiction       | Population |         | Households |        | Employment |         |
|-------------|--------------------|------------|---------|------------|--------|------------|---------|
|             |                    | 2016       | 2045    | 2016       | 2045   | 2016       | 2045    |
| Imperial    | Brawley city       | 26,800     | 41,100  | 7,700      | 12,800 | 8,000      | 13,600  |
| Imperial    | Calexico city      | 40,800     | 67,500  | 10,000     | 22,300 | 10,800     | 20,800  |
| Imperial    | Calipatria city    | 7,500      | 9,700   | 1,000      | 1,700  | 1,800      | 3,000   |
| Imperial    | El Centro city     | 45,500     | 58,800  | 13,100     | 20,500 | 23,200     | 48,100  |
| Imperial    | Holtville city     | 6,200      | 7,700   | 1,800      | 2,600  | 1,800      | 2,800   |
| Imperial    | Imperial city      | 18,400     | 27,800  | 5,100      | 10,100 | 4,600      | 11,600  |
| Imperial    | Westmorland city   | 2,300      | 2,400   | 600        | 600    | 300        | 300     |
| Imperial    | Unincorporated     | 39,700     | 66,200  | 10,700     | 21,800 | 16,400     | 29,900  |
| Los Angeles | Agoura Hills city  | 21,000     | 22,400  | 7,400      | 7,900  | 13,600     | 15,300  |
| Los Angeles | Alhambra city      | 86,600     | 91,200  | 29,900     | 32,000 | 37,400     | 40,600  |
| Los Angeles | Arcadia city       | 57,300     | 62,200  | 19,600     | 22,400 | 32,600     | 36,100  |
| Los Angeles | Artesia city       | 16,800     | 17,800  | 4,500      | 5,000  | 6,100      | 6,600   |
| Los Angeles | Avalon city        | 3,700      | 4,100   | 1,400      | 2,100  | 2,600      | 2,800   |
| Los Angeles | Azusa city         | 49,600     | 56,200  | 13,400     | 16,400 | 19,400     | 21,800  |
| Los Angeles | Baldwin Park city  | 75,400     | 81,700  | 16,900     | 19,200 | 24,700     | 26,500  |
| Los Angeles | Bell city          | 36,400     | 37,100  | 8,900      | 9,200  | 12,400     | 13,200  |
| Los Angeles | Bellflower city    | 76,700     | 77,000  | 23,200     | 23,400 | 17,600     | 18,300  |
| Los Angeles | Bell Gardens city  | 42,800     | 44,300  | 9,700      | 10,200 | 9,600      | 10,300  |
| Los Angeles | Beverly Hills city | 34,700     | 35,800  | 14,800     | 15,700 | 74,600     | 81,300  |
| Los Angeles | Bradbury city      | 1,100      | 1,100   | 400        | 400    | 200        | 200     |
| Los Angeles | Burbank city       | 105,000    | 115,400 | 41,900     | 48,600 | 114,000    | 138,700 |
| Los Angeles | Calabasas city     | 24,200     | 24,900  | 8,800      | 9,300  | 20,500     | 20,800  |
| Los Angeles | Carson city        | 93,600     | 105,200 | 25,500     | 30,700 | 63,400     | 70,000  |
| Los Angeles | Cerritos city      | 49,700     | 50,100  | 15,500     | 15,600 | 39,000     | 39,200  |
| Los Angeles | Claremont city     | 36,200     | 39,800  | 11,800     | 13,700 | 18,800     | 20,200  |

Attachment: Appeal Form and Supporting Documentation (City of Cerritos) (Appeal of the Draft RHNA

**TABLE 14 Jurisdiction-Level Growth Forecast - Continued**

| County      | Jurisdiction              | Population |         | Households |        | Employment |         |
|-------------|---------------------------|------------|---------|------------|--------|------------|---------|
|             |                           | 2016       | 2045    | 2016       | 2045   | 2016       | 2045    |
| Los Angeles | Commerce city             | 13,100     | 13,800  | 3,400      | 3,700  | 53,400     | 56,000  |
| Los Angeles | Compton city              | 100,000    | 103,100 | 23,500     | 24,600 | 28,600     | 30,200  |
| Los Angeles | Covina city               | 49,000     | 50,500  | 16,000     | 16,800 | 26,300     | 28,900  |
| Los Angeles | Cudahy city               | 24,400     | 25,600  | 5,600      | 6,100  | 2,900      | 3,000   |
| Los Angeles | Culver City city          | 40,100     | 41,600  | 17,000     | 18,000 | 59,300     | 64,100  |
| Los Angeles | Diamond Bar city          | 57,900     | 64,700  | 18,900     | 22,400 | 14,600     | 19,600  |
| Los Angeles | Downey city               | 113,300    | 119,200 | 32,600     | 34,100 | 42,900     | 45,800  |
| Los Angeles | Duarte city               | 22,000     | 25,100  | 7,100      | 8,100  | 11,300     | 15,700  |
| Los Angeles | El Monte city             | 114,300    | 137,500 | 27,500     | 36,300 | 30,600     | 37,100  |
| Los Angeles | El Segundo city           | 16,700     | 17,200  | 7,000      | 7,300  | 48,300     | 52,400  |
| Los Angeles | Gardena city              | 60,600     | 65,700  | 20,800     | 23,700 | 29,300     | 32,100  |
| Los Angeles | Glendale city             | 201,200    | 214,100 | 74,500     | 82,300 | 117,000    | 125,900 |
| Los Angeles | Glendora city             | 52,300     | 55,700  | 17,600     | 19,500 | 21,600     | 23,100  |
| Los Angeles | Hawaiian Gardens city     | 14,800     | 15,700  | 3,600      | 4,000  | 7,900      | 8,500   |
| Los Angeles | Hawthorne city            | 89,400     | 92,900  | 29,700     | 31,600 | 28,500     | 31,700  |
| Los Angeles | Hermosa Beach city        | 19,700     | 20,600  | 9,500      | 9,900  | 7,700      | 10,500  |
| Los Angeles | Hidden Hills city         | 1,900      | 2,000   | 600        | 700    | 300        | 300     |
| Los Angeles | Huntington Park city      | 59,400     | 64,000  | 14,700     | 16,500 | 15,900     | 17,800  |
| Los Angeles | Industry city             | 400        | 400     | 100        | 100    | 80,400     | 80,400  |
| Los Angeles | Inglewood city            | 114,300    | 137,100 | 37,500     | 47,700 | 33,800     | 45,900  |
| Los Angeles | Irwindale city            | 1,400      | 1,900   | 400        | 500    | 18,900     | 20,300  |
| Los Angeles | La Cañada Flintridge city | 20,500     | 21,600  | 6,800      | 7,200  | 7,700      | 8,700   |
| Los Angeles | La Habra Heights city     | 5,500      | 5,800   | 1,800      | 2,000  | 900        | 1,000   |
| Los Angeles | Lakewood city             | 79,300     | 84,500  | 25,800     | 28,700 | 20,900     | 22,500  |
| Los Angeles | La Mirada city            | 49,400     | 52,400  | 14,700     | 16,200 | 18,000     | 19,600  |

Attachment: Appeal Form and Supporting Documentation (City of Cerritos) (Appeal of the Draft RHNA

**TABLE 14 Jurisdiction-Level Growth Forecast - Continued**

| County      | Jurisdiction               | Population |           | Households |           | Employment |           |
|-------------|----------------------------|------------|-----------|------------|-----------|------------|-----------|
|             |                            | 2016       | 2045      | 2016       | 2045      | 2016       | 2045      |
| Los Angeles | Lancaster city             | 157,800    | 213,300   | 46,900     | 74,600    | 56,300     | 65,500    |
| Los Angeles | La Puente city             | 40,400     | 41,600    | 9,400      | 9,900     | 6,600      | 8,200     |
| Los Angeles | La Verne city              | 33,100     | 34,400    | 11,700     | 12,400    | 17,000     | 18,300    |
| Los Angeles | Lawndale city              | 33,400     | 34,400    | 9,700      | 10,200    | 7,400      | 8,300     |
| Los Angeles | Lomita city                | 20,400     | 21,200    | 8,000      | 8,500     | 5,600      | 6,100     |
| Los Angeles | Long Beach city            | 470,900    | 489,600   | 168,600    | 198,200   | 155,900    | 185,400   |
| Los Angeles | Los Angeles city           | 3,933,800  | 4,771,300 | 1,367,000  | 1,793,000 | 1,848,300  | 2,135,900 |
| Los Angeles | Lynwood city               | 71,900     | 76,900    | 14,900     | 16,500    | 12,000     | 13,100    |
| Los Angeles | Malibu city                | 12,700     | 13,000    | 5,200      | 5,400     | 9,900      | 11,000    |
| Los Angeles | Manhattan Beach city       | 35,400     | 35,600    | 13,900     | 14,000    | 22,000     | 23,600    |
| Los Angeles | Maywood city               | 28,000     | 29,000    | 6,600      | 7,000     | 4,000      | 4,300     |
| Los Angeles | Monrovia city              | 38,000     | 42,100    | 14,000     | 16,700    | 22,700     | 24,800    |
| Los Angeles | Montebello city            | 63,900     | 67,800    | 19,100     | 21,100    | 29,300     | 31,300    |
| Los Angeles | Monterey Park city         | 61,500     | 65,600    | 20,000     | 22,200    | 45,500     | 48,000    |
| Los Angeles | Norwalk city               | 105,500    | 107,000   | 26,700     | 27,300    | 25,700     | 28,100    |
| Los Angeles | Palmdale city              | 158,600    | 207,000   | 43,800     | 61,800    | 36,700     | 45,900    |
| Los Angeles | Palos Verdes Estates city  | 13,700     | 14,000    | 5,100      | 5,300     | 3,000      | 3,300     |
| Los Angeles | Paramount city             | 55,900     | 57,500    | 14,100     | 14,500    | 21,400     | 23,000    |
| Los Angeles | Pasadena city              | 142,100    | 155,500   | 56,300     | 65,100    | 116,200    | 140,200   |
| Los Angeles | Pico Rivera city           | 63,500     | 67,400    | 16,600     | 18,500    | 24,900     | 27,200    |
| Los Angeles | Pomona city                | 154,700    | 187,600   | 39,300     | 52,800    | 55,700     | 63,400    |
| Los Angeles | Rancho Palos Verdes city   | 42,800     | 43,000    | 15,700     | 15,800    | 8,000      | 8,200     |
| Los Angeles | Redondo Beach city         | 68,200     | 72,900    | 29,200     | 31,100    | 25,400     | 28,300    |
| Los Angeles | Rolling Hills city         | 1,900      | 2,000     | 700        | 700       | 100        | 100       |
| Los Angeles | Rolling Hills Estates city | 8,100      | 8,500     | 2,900      | 3,200     | 7,100      | 7,600     |

Attachment: Appeal Form and Supporting Documentation (City of Cerritos) (Appeal of the Draft RHNA)

**TABLE 14 Jurisdiction-Level Growth Forecast - Continued**

| County | Jurisdiction                | Population |         | Households |         | Employment |         |
|--------|-----------------------------|------------|---------|------------|---------|------------|---------|
|        |                             | 2016       | 2045    | 2016       | 2045    | 2016       | 2045    |
| Orange | Buena Park city             | 83,400     | 96,200  | 24,200     | 28,600  | 33,600     | 38,200  |
| Orange | Costa Mesa city             | 113,900    | 123,700 | 40,500     | 44,200  | 95,700     | 104,000 |
| Orange | Cypress city                | 49,600     | 51,300  | 15,800     | 16,600  | 27,500     | 30,600  |
| Orange | Dana Point city             | 33,600     | 35,600  | 14,300     | 15,200  | 11,700     | 13,500  |
| Orange | Fountain Valley city        | 56,700     | 59,000  | 18,800     | 19,400  | 31,600     | 34,200  |
| Orange | Fullerton city              | 141,900    | 158,300 | 46,400     | 52,900  | 63,200     | 85,400  |
| Orange | Garden Grove city           | 176,000    | 185,800 | 46,300     | 49,200  | 57,800     | 68,200  |
| Orange | Huntington Beach city       | 196,900    | 205,300 | 77,000     | 80,300  | 83,400     | 90,800  |
| Orange | Irvine city                 | 261,600    | 327,700 | 93,300     | 121,700 | 265,300    | 330,200 |
| Orange | Laguna Beach city           | 23,400     | 23,500  | 10,900     | 11,000  | 5,800      | 6,100   |
| Orange | Laguna Hills city           | 31,200     | 34,000  | 10,400     | 11,700  | 18,300     | 18,800  |
| Orange | Laguna Niguel city          | 66,100     | 69,700  | 24,800     | 26,200  | 19,600     | 22,200  |
| Orange | Laguna Woods city           | 16,300     | 16,500  | 11,400     | 11,500  | 5,400      | 6,800   |
| Orange | La Habra city               | 61,900     | 66,200  | 19,200     | 20,600  | 18,200     | 19,700  |
| Orange | Lake Forest city            | 84,100     | 92,900  | 27,700     | 30,800  | 42,500     | 48,900  |
| Orange | La Palma city               | 16,000     | 16,100  | 5,100      | 5,100   | 15,300     | 15,700  |
| Orange | Los Alamitos city           | 11,600     | 12,300  | 4,100      | 4,400   | 14,800     | 16,000  |
| Orange | Mission Viejo city          | 96,600     | 98,600  | 33,900     | 34,200  | 38,600     | 38,800  |
| Orange | Newport Beach city          | 84,900     | 92,000  | 38,900     | 41,800  | 83,400     | 84,900  |
| Orange | Orange city                 | 140,900    | 154,000 | 43,700     | 48,700  | 123,000    | 131,300 |
| Orange | Placentia city              | 52,300     | 58,900  | 16,600     | 18,800  | 19,900     | 21,500  |
| Orange | Rancho Santa Margarita city | 48,600     | 49,800  | 16,700     | 17,000  | 15,600     | 18,800  |
| Orange | San Clemente city           | 65,900     | 69,600  | 24,200     | 25,400  | 28,600     | 31,100  |
| Orange | San Juan Capistrano city    | 36,100     | 41,900  | 11,600     | 13,400  | 17,200     | 19,200  |
| Orange | Santa Ana city              | 340,200    | 360,100 | 73,900     | 80,100  | 162,900    | 172,400 |

Attachment: Appeal Form and Supporting Documentation (City of Cerritos) (Appeal of the Draft RHNA





**A202100 - Total Workers (1) (Workers 16 years and over)**

Current date: 10/15/2020 7:30:58 PM (Eastern Daylight Time)

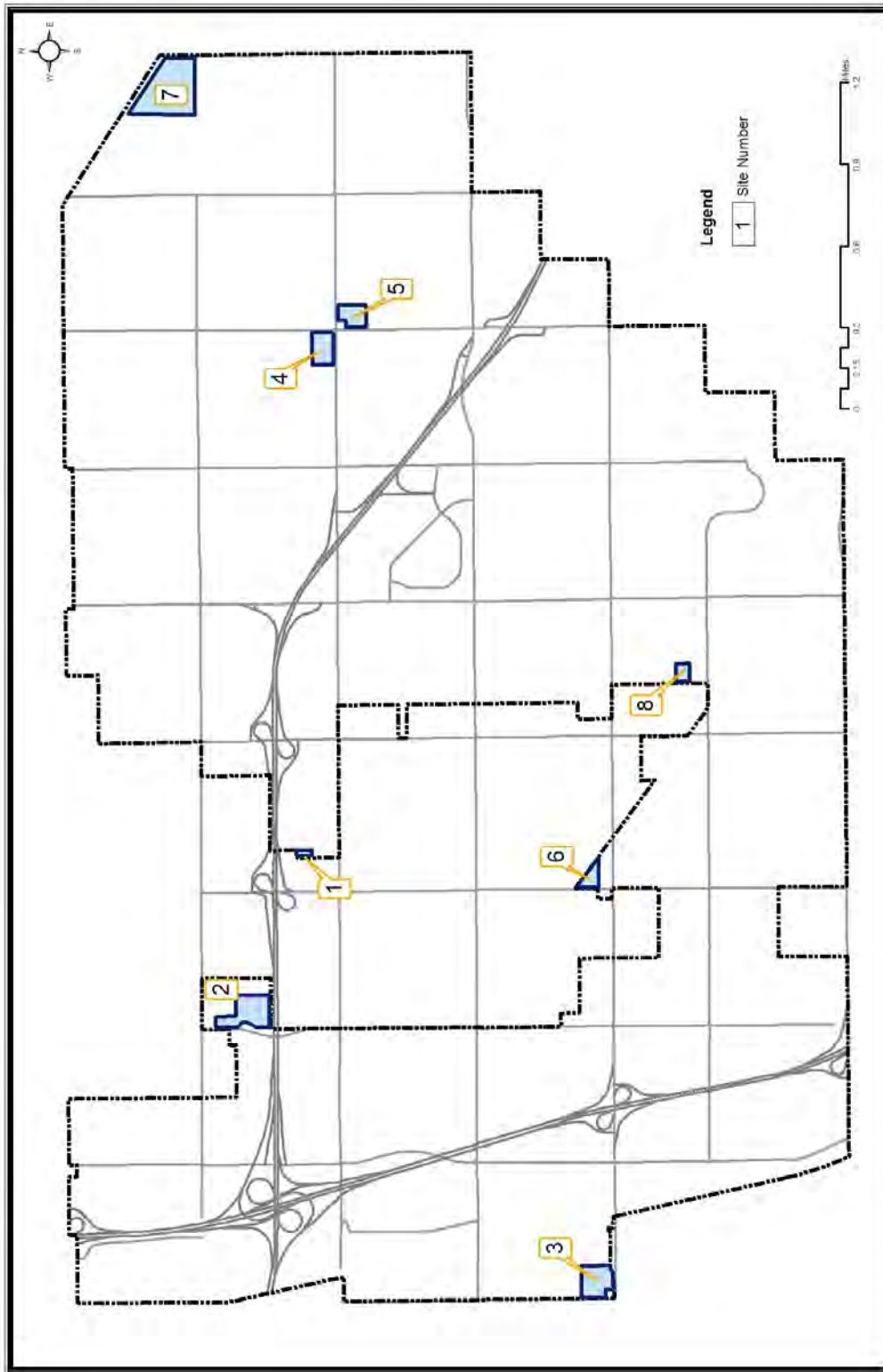
Measures: Workers 16 and Over

| Output                                | Estimate      | Margin of Error |
|---------------------------------------|---------------|-----------------|
| <b>WORKPLACE</b>                      |               |                 |
| Castaic CDP, California               | 2,375         | 365             |
| Castle Hill CDP, California           | 115           | 80              |
| Castro Valley CDP, California         | 12,930        | 728             |
| Castroville CDP, California           | 1,250         | 244             |
| Cathedral City city, California       | 11,570        | 847             |
| Catheys Valley CDP, California        | 110           | 53              |
| Cayucos CDP, California               | 995           | 232             |
| Cazadero CDP, California              | 110           | 55              |
| Cedar Ridge CDP, California           | 50            | 28              |
| Cedar Slope CDP, California           | 20            | 25              |
| Cedarville CDP, California            | 205           | 70              |
| Centerville CDP, California           | 275           | 90              |
| Ceres city, California                | 12,490        | 732             |
| <b>Cerritos city, California</b>      | <b>34,850</b> | <b>1,137</b>    |
| Chalfant CDP, California              | 10            | 14              |
| Challenge-Brownsville CDP, California | 70            | 71              |
| Channel Islands Beach CDP, California | 395           | 120             |
| Charter Oak CDP, California           | 1,305         | 252             |
| Cherokee CDP, California              | 4             | 8               |
| Cherokee Strip CDP, California        | 0             | 11              |
| Cherryland CDP, California            | 980           | 179             |
| Cherry Valley CDP, California         | 785           | 188             |
| Chester CDP, California               | 1,260         | 204             |
| Chico city, California                | 50,160        | 1,573           |
| Chilcoot-Vinton CDP, California       | 4             | 3               |
| China Lake Acres CDP, California      | 30            | 32              |
| Chinese Camp CDP, California          | 20            | 27              |
| Chino city, California                | 45,145        | 1,638           |
| Chino Hills city, California          | 14,085        | 823             |
| Chowchilla city, California           | 3,890         | 500             |
| Chualar CDP, California               | 305           | 125             |
| Chula Vista city, California          | 65,610        | 1,866           |

Attachment: Appeal Form and Supporting Documentation (City of Cerritos) (Appeal of the Draft RHNA Allocation for the City of Cerritos)

U.S. Census Bureau, American Community Survey 2012-2016 Five-year estimates. Special Tabulation: Census Transportation Planning

Attachment: Appeal Form and Supporting Documentation (City of Cerritos) (Appeal of the Draft RHNA Allocation for the City of Cerritos)

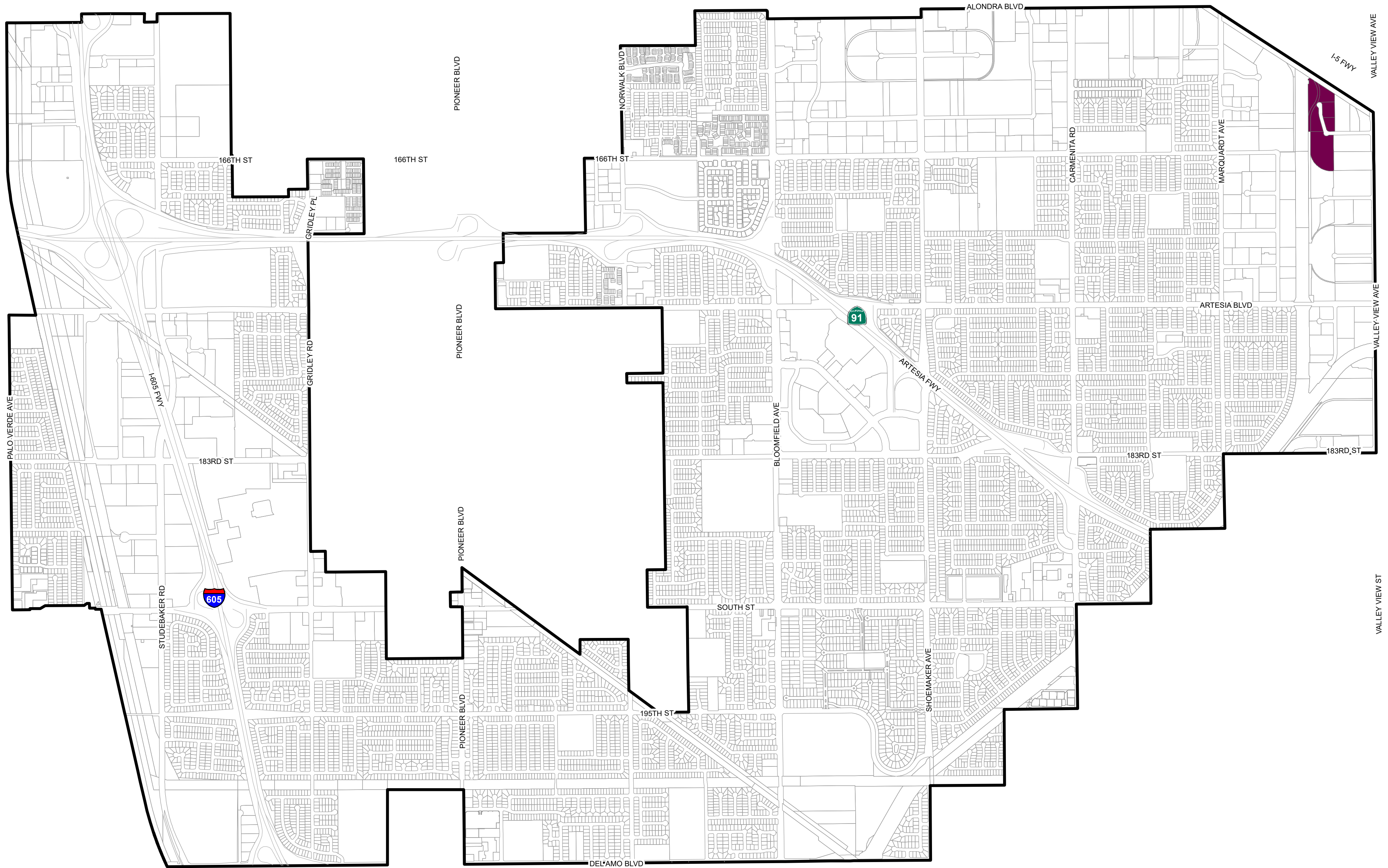


Attachment 1

 - Proposed Housing Sites



# Potential Infill Parcels in City of Cerritos

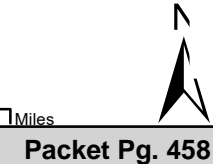


Updated: August 30, 2018

## Potential Infill Parcels

- Vacant Parcels
- Refill Parcels

0 0.075 0.15 0.3 0.45 Miles



# **Do the Math: The state has ordered more than 350 cities to prepare the way for more than 2 million homes by 2030. But what if the math is wrong?**

**Senate Bill 828, co-sponsored by the Bay Area Council and Silicon Valley Leadership Group, and authored by state Sen. Scott Wiener in 2018, has inadvertently doubled the “Regional Housing Needs Assessment” in California.**

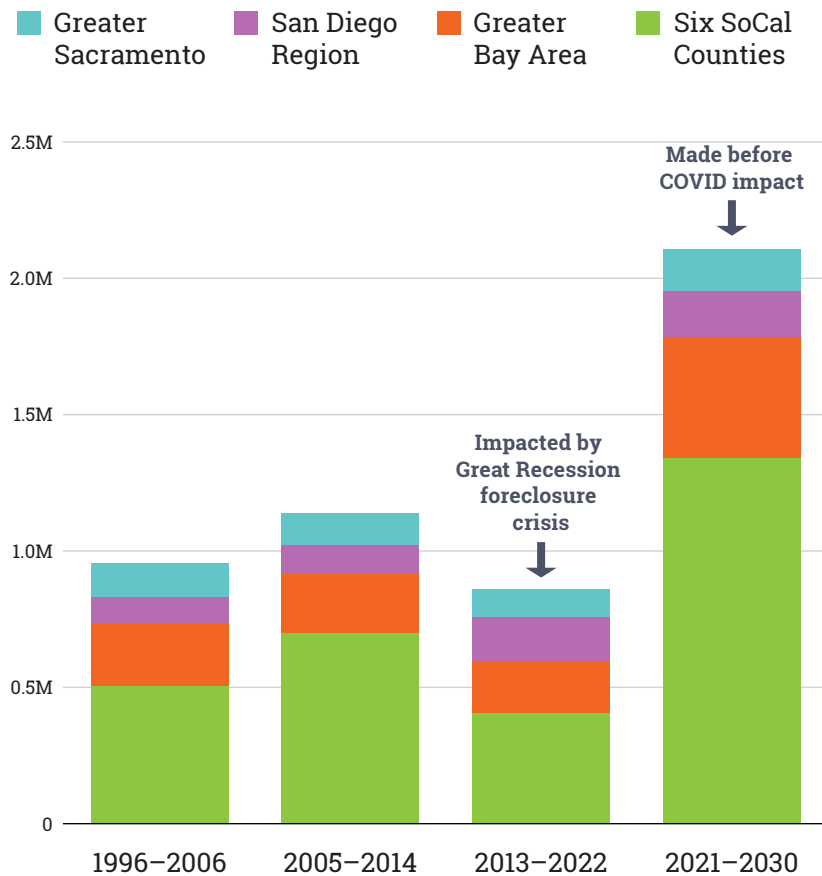
Use of an incorrect vacancy rate and double counting, inspired by SB-828, caused the state’s Department of Housing and Community Development (HCD) to exaggerate by more than 900,000 the units needed in SoCal, the Bay Area, and the Sacramento area.

The state’s approach to determining the housing need must be defensible and reproducible if cities are to be held accountable. Inaccuracies on this scale mask the fact that cities and counties are surpassing the state’s market-rate housing targets but falling far short in meeting affordable housing targets. The inaccuracies obscure the real problem and the associated solution to the housing crisis—the funding of affordable housing.

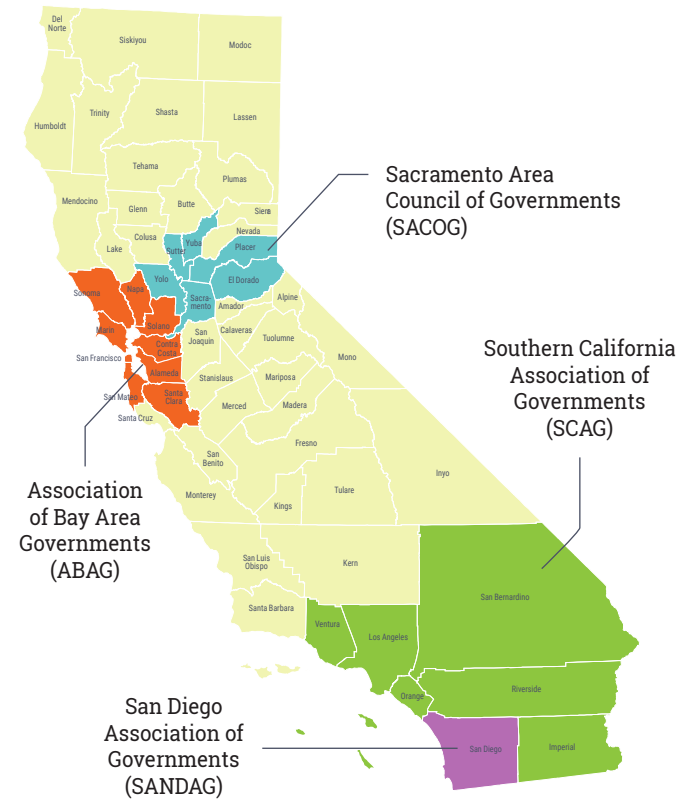
# Double counting (not surprisingly) doubled the assessed housing need for the four major planning regions.

Every five to eight years the Department of Housing and Community Development (HCD) supervises and publishes the results of a process referred to as the Regional Housing Needs Assessment (RHNA). Four regional planning agencies cover the 21 most urban counties and account for 80% of California’s housing. All four regions saw a significant jump in the state’s assessment of their housing need for the years 2021 to 2030.

**Housing Units Needed According to the State, (1996–2030)**



**Four Regions Contain 80% of the State’s Housing**



# The double count, an unintended consequence of Senate Bill 828, has exaggerated the housing need by more than 900,000 units in the four regions below.

California plans for its housing needs in “cycles.” The four regions are on cycles that last roughly eight years with staggered start dates. In the 2021–2030 housing cycle, errors introduced by language in SB-828 nearly equal the entire 1.15M units of new housing required during the 2013–2022 “cycle.” As illustrated, Southern California and the Bay Area are the most impacted by the state’s methodology errors.





# Senate Bill 828 was drafted absent a detailed understanding of the Department of Finance’s methodology for developing household forecasts, and absent an understanding of the difference between rental and home-owner vacancies. These misunderstandings have unwittingly ensured a series of double counts.

## SB-828 MISTAKENLY ASSUMED:

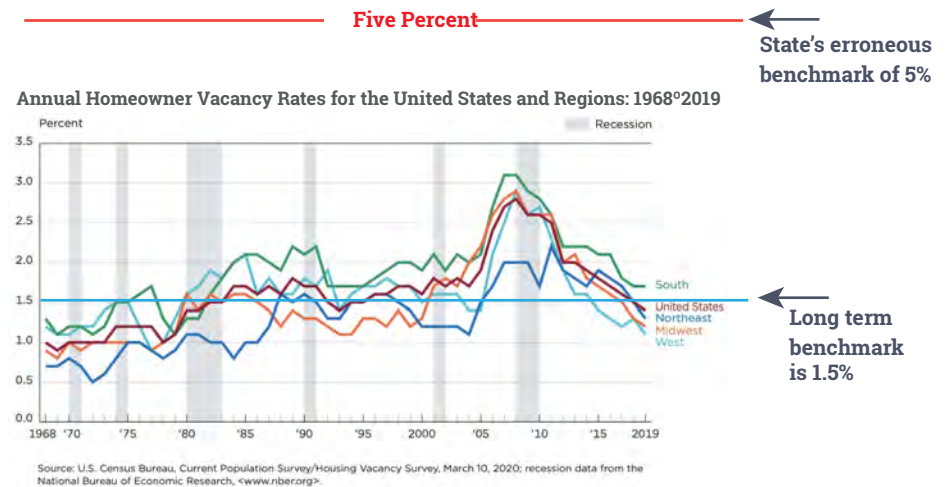
## THE REALITY IS:

1. SB-828 wrongly assumed ‘existing housing need’ was not evaluated as part of California’s previous Regional Housing Need Assessments, or RHNA. There was an assumption that only future need had been taken into account in past assessments. (In fact, as detailed in The Reality section, the state’s existing housing need was fully evaluated in previous RHNA assessment cycles).

1. Existing housing need has long been incorporated in California’s planning cycles. It has been evaluated by comparing existing vacancy rates with widely accepted benchmarks for healthy market vacancies (rental and owner-occupied). The difference between actual and benchmark is the measure of housing need/surplus in a housing market. Confusion about the inclusion of “existing need” may have arisen because vacancy rates at the time of the last assessment of housing need (“the 5th cycle”) were unusually high (higher than the healthy benchmarks) due to the foreclosure crisis of 2007–2010, and in fact, the vacancy rates suggested a surplus of housing. So, in the 5th cycle, the vacancy adjustment had the effect of lowering the total housing need. Correctly seeing the foreclosure crisis as temporary, the state Department of Finance did not apply the full weight of the surplus but instead assumed a percentage of the vacant housing would be absorbed by the time the 5th cycle began. The adjustment appears in the 5th cycle determinations, not as ‘Existing Housing Need’ but rather as “Adjustment for Absorption of Existing Excess Vacant Units.”

2. SB-828 wrongly assumed a 5% vacancy rate in owner-occupied housing is healthy (as explained in the column on the right, 5% vacancy in owner-occupied homes is never desirable, and contradicts Government Code 65584.01(b)(1)(E) which specifies that a 5% vacancy rate applies only to the rental housing market).

2. While 5% is a healthy benchmark for rental vacancies, it is unhealthy for owner-occupied housing (which typically represents half of existing housing). In the U.S. homeowner vacancy has hovered around 1.5% since the ‘70s, briefly reaching 3% during the foreclosure crisis. However, 5% is well outside any healthy norm, and thus does not appear on the Census chart (to the right) showing Annual Homeowner Vacancy Rates for the United States and Regions: 1968–2019.



3. SB-828 wrongly assumed overcrowding and cost-burdening had not been considered in Department of Finance projections of housing need. The bill sought to redress what it mistakenly thought had been left out by requiring regional planning agencies to report overcrowding and cost-burdening data to the Dept. of Housing and Community Development (as explained in the right column).

3. Unknown to the authors of SB-828, the Department of Finance (DOF) has for years factored overcrowding and cost-burdening into their household projections. These projections are developed by multiplying the estimated population by the headship rate (the proportion of the population who will be head of a household). The Department of Finance (DOF), in conjunction with the Department of Housing and Community Development (HCD), has documented its deliberate decision to use higher headship rates to reflect optimal conditions and intentionally “alleviate the burdens of high housing cost and overcrowding.” Unfortunately, SB-828 has caused the state to double count these important numbers.

# The forced double-counting errors are significant.\*

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## 1. Incorrect use of a 5% benchmark vacancy rate for owner-occupied housing.

The vacancy rate was incorrectly used for both existing and projected owner-occupied households.

**+ 229,000**  
housing units

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## 2. Current vacancies were assumed to exist in household projections.

This error is unrelated to SB-828, but is an accounting error introduced by HCD methodology.

**- 22,000**  
housing units

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## 3. Overcrowding and cost-burdening were double counted.\*\*

In addition to the household projection methodology outlined by the Department of Finance (shown to account for overcrowding and cost-burdening), the matter is also mentioned in meeting notes available on the Association of Bay Area Government's (ABAG) website.\*\*\*

Quote from ABAG's Housing Methodology Committee Agenda Packet for the 4th RHNA Cycle, July 2006

"There was also a lot of discussion about the headship rates used by HCD/DOF. Several people commented that headship rates in the Bay Area are generally lower than the State's estimates because the region's high housing costs limit household formation. In response, Mr. Fassinger noted that HCD uses these higher headship rates because the RHNA process is intended to alleviate the burdens of high housing cost and overcrowding."

Despite this, overcrowding and cost-burdening were counted a second time as adjustment factors required by SB-828.

**+ 734,000**  
housing units

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**TOTAL: + 941,000**  
housing units

\* All errors are rounded to the nearest thousand.

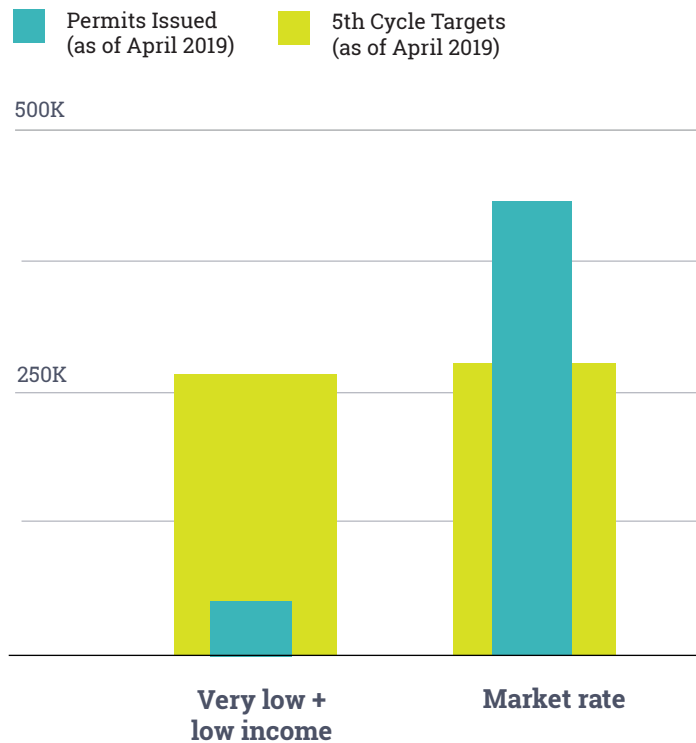
\*\* Overcrowding measures the number of households with more than 1 person per room. Cost-burdening measures the number of households that spend more than 30% of the household income on housing. Cost-burdening is measured by five income levels – extremely low, very low, low, moderate, above moderate

\*\*\* P-4 tables are created by the Department of Finance–Household Projection table 2020–2030 and their methodology is fully explained in 'read me' notes that accompany the table.

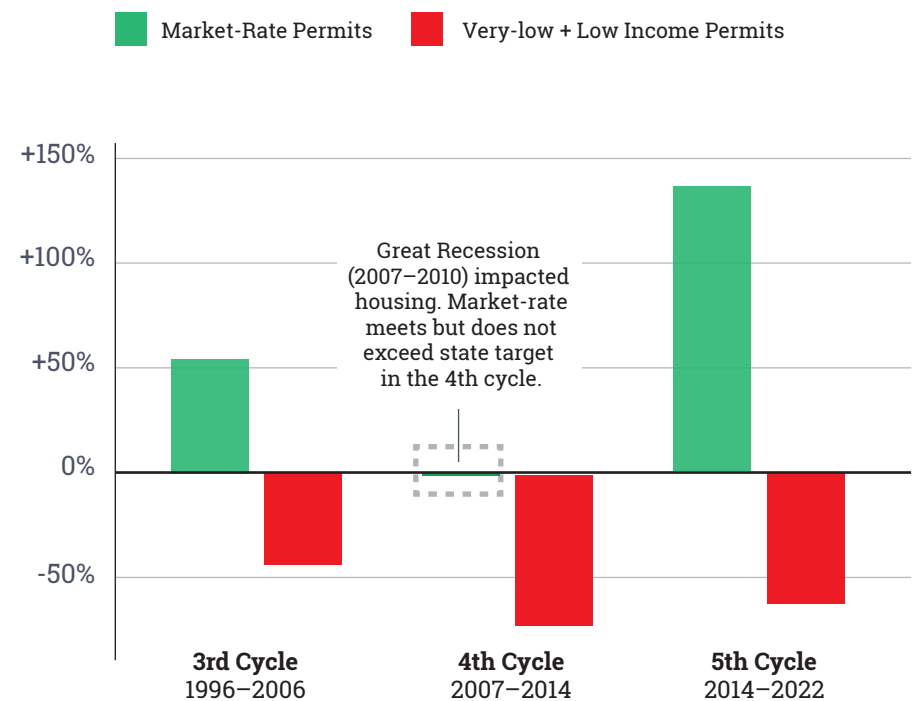
# The state's exaggerated targets unfortunately mask the real story: Decades of overachieving in market-rate housing has not reduced housing costs for lower income households.

The state has shown, with decades of data, that it cannot dictate to the market. The market is going to take care of itself. The state's responsibility is to take care of those left behind in the market's wake. Based on housing permit progress reports published by the Dept. of Housing and Community Development in July 2020, cities and counties in the four most populous regions continue to strongly outperform on the state's assigned market-rate housing targets, but fail to achieve even 20% of their low-income housing target. In the Bay Area where permit records have been kept since 1997, there is evidence that this housing permit imbalance has propagated through decades of housing cycles.

## Permit Progress in the 5th Cycle (2013-2022)\* (all 4 regions)



## Affordable Housing Languishes as Market-Rate Housing Overachieves (Bay Area only)\*



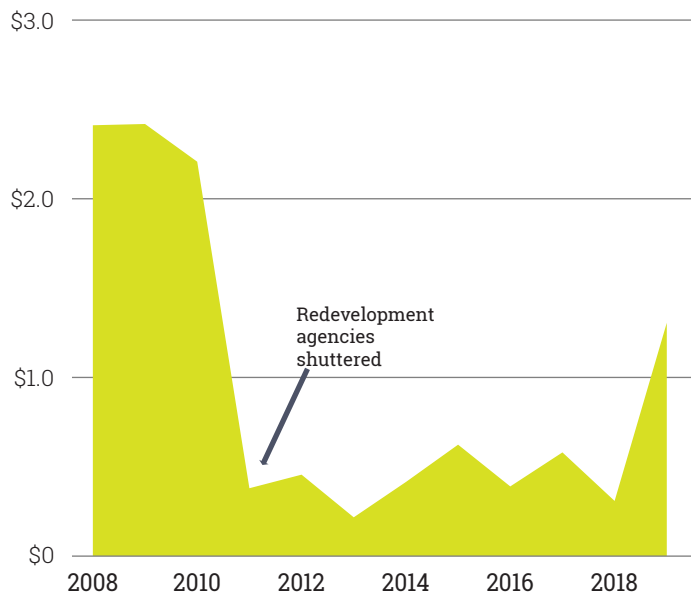
\* Based on permit progress reports published by the Dept of Housing and Community Development and updated July 2020, reporting progress through April 2019.

\*\* Only the Bay Area is shown because other regions have not kept detailed records of permit progress through the 3rd and 4th cycles.

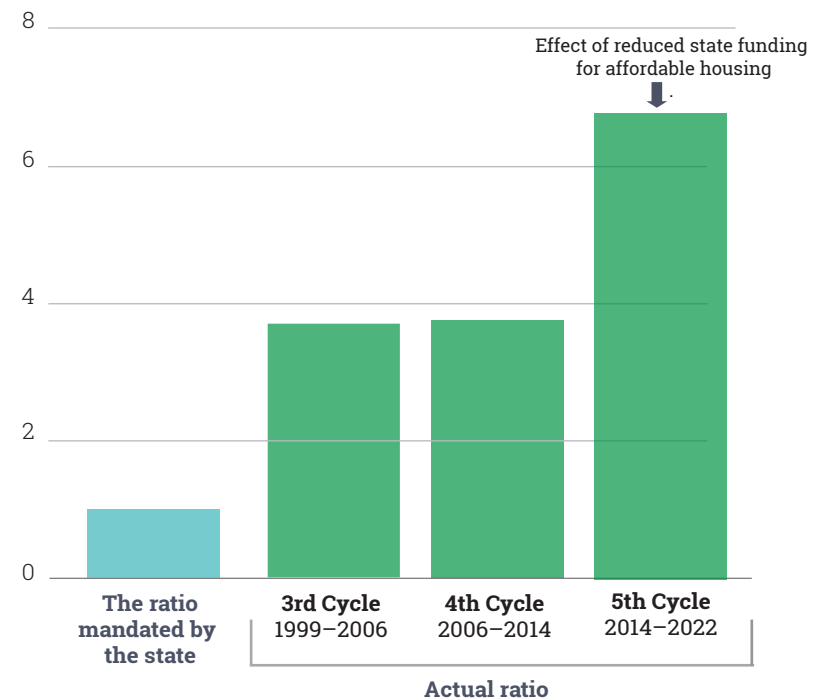
# It's clear. Market-rate housing doesn't need state incentives. Affordable housing needs state

Cities are charged by the state to build one market-rate home for every one affordable home. But state laws, such as the density bonus law, incentivize developers to build market-rate units at a far higher rate than affordable units. As a result, California has been building four market-rate units for every one affordable unit for decades. And with the near-collapse of legislative funding for low-income housing in 2011, that ratio has grown to seven to eight market-rate units to each affordable unit. Yet we need one-to-one. This worsening situation can't be fixed by zoning or incentives, which are the focus of many recent housing bills and only reinforce or worsen the ever-higher market-rate housing ratios. From the data it appears that the shortage of housing resulted not from a failure by cities to issue housing permits, but rather a failure by the state to fund and support affordable housing. Future legislative efforts should take note.

**State Funds for Affordable Housing, 2008–2019\***  
\$ Billion



**Market-Rate to Low-Income Housing Permits in the Bay Area has grown from a ratio of 4 : 1 to 7 : 1**  
(Bay Area only)\*\*



\* "The Defunding of Affordable Housing in California", Embarcadero Institute, update June 2020 [www.embarcaderoinstitute.com/reports/](http://www.embarcaderoinstitute.com/reports/)

\*\* Only Bay Area is shown because other regions have not kept detailed records of permit progress through the 3rd and 4th cycles. Data is from ABAG's permit progress reports for 3rd and 4th cycle and Dept. of Housing and Community Development's 5th cycle Annual Progress Report.

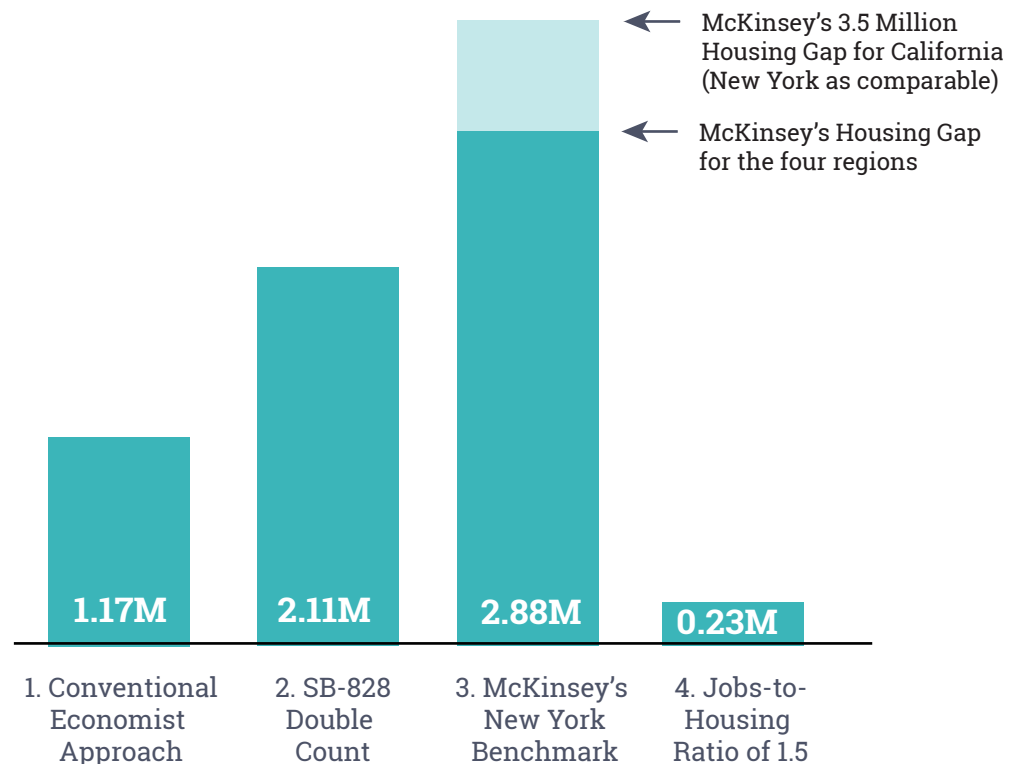
# Finally, since penalties are incurred for failing to reach state targets for housing permits, the methodology for developing these numbers must be transparent, rigorous and defensible.

Non-performance in an income category triggers a streamlined approval process per Senate Bill 35 (2017). These exaggerated 6th cycle targets will make it impossible for cities and counties to attain even their market-rate targets, ensuring market-rate housing will qualify for incentives and bonuses meant for low-income housing. **Yet again, low-income housing will lose out.** The state needs to correct the latest housing assessment errors and settle on a consistent, defensible approach going forward.

## At Least Four Different Methodologies Have Been Used Simultaneously by the State to Discuss Housing Need: We Only Need One

- 1. The Conventional Economist Approach:** uses goldilocks (not too big, not too small, just right) benchmarks for vacancies - 1.5% for owner-occupied and 5% for rental housing.
- 2. SB-828 Double Count:** incorrectly uses a benchmark of 5% vacancy for owner-occupied housing. It also double counts overcrowding and cost-burdening
- 3. McKinsey's New York Benchmark:** the over-simplified approach generated an exaggerated housing gap of 3.5 Million for California. McKinsey multiplied California's population by New York's housing per capita to get 3.5M. New York is not a proper benchmark for California and NY's higher housing per capita is more reflective of NY's declining population rather than a healthy benchmark for housing
- 4. Jobs-to-housing ratio of 1.5:** according to state planning agencies 1.5 is the optimal benchmark. Employment in the four regions is estimated to grow to 17 million by 2030 (job growth estimates prepared before COVID).\*\*

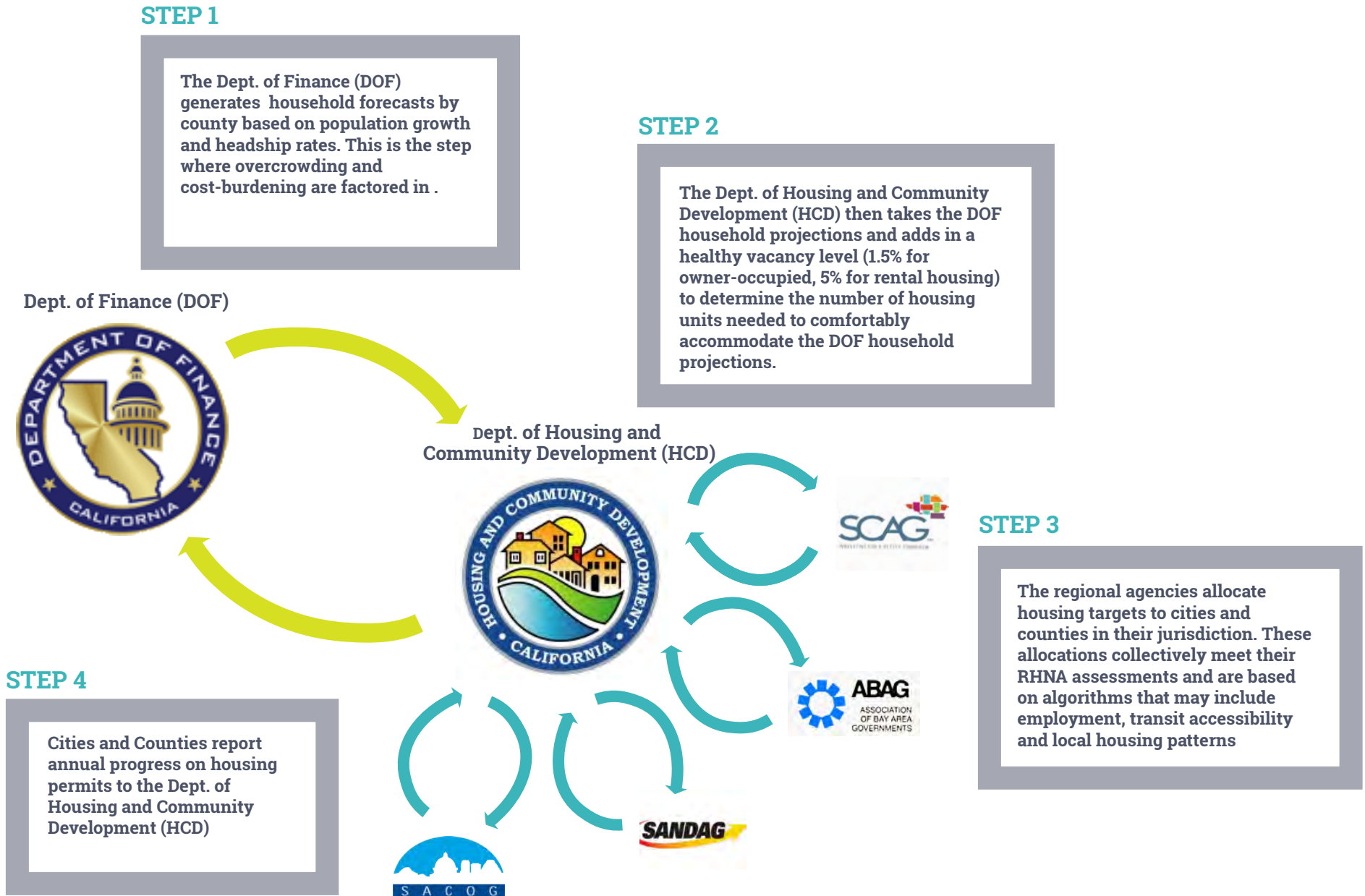
## Forecast 2030 Housing Need for the Four Regions



\* California's Employment Development Department (EDD) estimates employment by county through 2026. Using annualized growth (2016 to 2026) as a basis for future growth 2030 employment is estimated for the four regions.

\*\* The 17 million includes estimates of self employed, private household workers, farm and nonfarm employment. Occupations with employment below 100 in 2016 are excluded.

**How it Works: A multi-agency collaborative effort has generated past state housing targets. However, in 2018, SB-828 anointed the Dept. of Housing and Community Development with final veto powers.**



**SB-828 introduced errors in Step 2 (when the Dept. of Housing and Community Development made adjustments to the Dept. of Finance’s household projections).**

Southern California and the Bay Area were most impacted by the double counting. San Diego was not assessed for cost-burdening although it is more cost-burdened than the Bay Area. It was perhaps overlooked because its assessment cycle began in July, 2018, a few months before SB-828 passed into law.

**The Department of Housing and Community and Development**

**1. Used a benchmark of 5% vacancy rate for BOTH owner-occupied and rental housing.**

|                           |          |                 |                                   |
|---------------------------|----------|-----------------|-----------------------------------|
| <b>Six SoCal Counties</b> | <b>=</b> | <b>+126,000</b> | <b>+ 229,000</b><br>housing units |
| <b>Greater Bay Area</b>   | <b>=</b> | <b>+59,000</b>  |                                   |
| <b>San Diego Area</b>     | <b>=</b> | <b>+23,000</b>  |                                   |
| <b>Greater Sacramento</b> | <b>=</b> | <b>+21,000</b>  |                                   |

**2. Assumed vacancies in household projections \***

|                           |          |                |                                  |
|---------------------------|----------|----------------|----------------------------------|
| <b>Six SoCal Counties</b> | <b>=</b> | <b>-13,000</b> | <b>- 22,000</b><br>housing units |
| <b>Greater Bay Area</b>   | <b>=</b> | <b>-4,000</b>  |                                  |
| <b>San Diego Area</b>     | <b>=</b> | <b>-2,000</b>  |                                  |
| <b>Greater Sacramento</b> | <b>=</b> | <b>-3,000</b>  |                                  |

**3. Double counted overcrowding and cost-burdening**

|                           |          |                 |                                   |
|---------------------------|----------|-----------------|-----------------------------------|
| <b>Six SoCal Counties</b> | <b>=</b> | <b>+578,000</b> | <b>+ 734,000</b><br>housing units |
| <b>Greater Bay Area</b>   | <b>=</b> | <b>+104,000</b> |                                   |
| <b>San Diego Area</b>     | <b>=</b> | <b>+39,000</b>  |                                   |
| <b>Greater Sacramento</b> | <b>=</b> | <b>+13,000</b>  |                                   |

\* P-4 tables are created by the Department of Finance—Household Projection table 2020–2030 and their methodology is fully explained in ‘read me’ notes that accompany the table  
 \*\* Overcrowding measures the number of households with more than 1 person per room. Cost-burdening measures the number of households that spend more than 30% of the household income on housing. Cost-burdening is measured by five income levels—extremely low, very low, low, moderate, above moderate.

## Detailed explanation of the errors using SoCal Counties as an example: First—the correct approach.

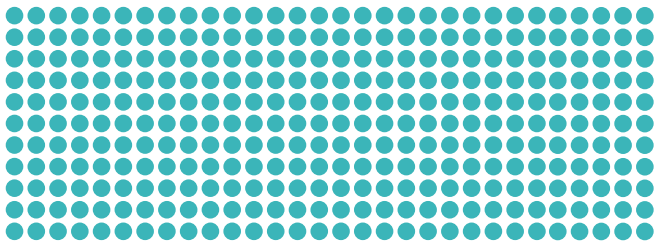
The Department of Housing and Community Development (HCD) has traditionally arrived at a number for pent-up demand or housing shortfall by comparing vacancy rates in owner-occupied and rental housing to healthy benchmarks (1.5% for owner-occupied\* and 5% for rental housing). The largest of the four regions, six SoCal Counties (covering Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties) is considered in the example below\*\*.

### EXISTING HOUSING: Six SoCal Counties

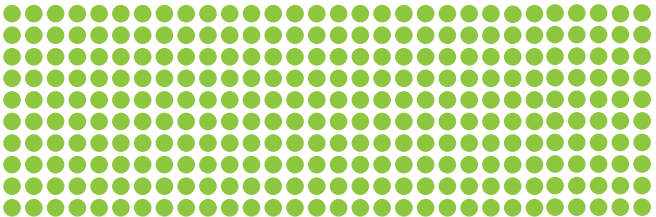
1 circle = 10,000 households

#### Occupied Housing Units

##### Home-owned (3.3 Million)



##### Rentals (3 Million)



#### Vacant Housing Units

Actual Vacancies (40,000)



1.2%

Healthy Benchmark (50,000)



1.5%

#### Existing Need

(10,000)



Actual Vacancies (111,000)



3.7%

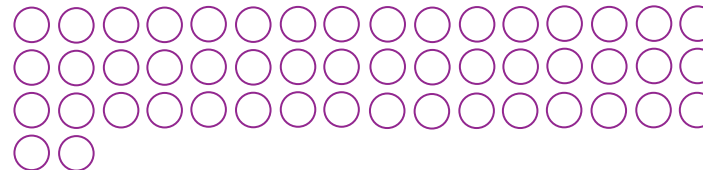
Healthy Benchmark (150,000)



5.0%

(39,000)

Seasonal Vacancies (500,000)\*\*\*



\* Owner-occupied has a lower healthy vacancy rate because it is usually only vacant while a house is for sale

\*\* All numbers are rounded to the nearest thousand.

\*\*\* Seasonal Vacancies represent second homes, corporate housing, and short-term rentals such as AirBnBs

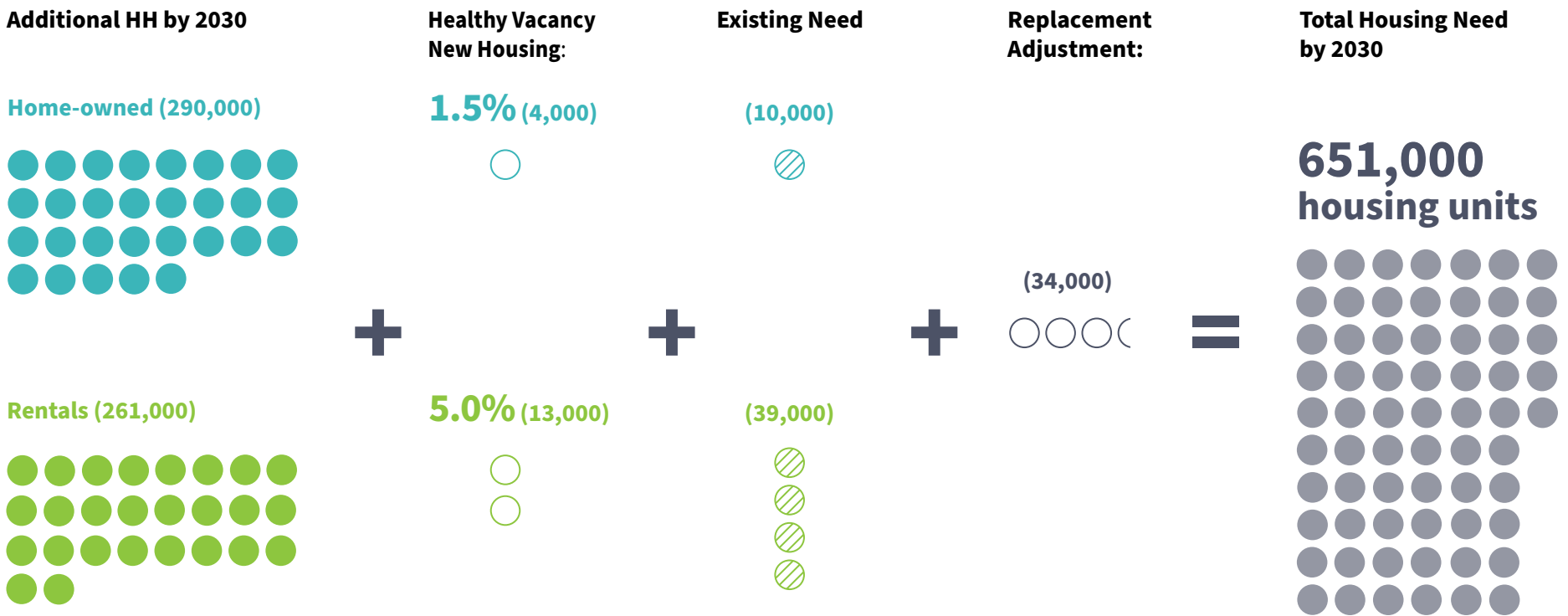


## The housing need also takes into account for future growth.

The Dept. of Finance (DOF) supplies the Dept. of Housing and Community Development (HCD) with an estimate of additional households (HH) needed by the end of the cycle. The DOF forecast the 2030 population, and using an optimal household formation rate determine the number of households required to comfortably house that population\*. The DOF also supply the HCD with the number of existing households at the start of the cycle. The HCD adds to the base number of additional households needed, factoring in vacancies for a healthy market, and adding a replacement adjustment (also supplied by the DOF)\*\*.

### PROJECTED HOUSING NEED: Six SoCal Counties

1 circle = 10,000 households



\* Households represent occupied housing units. The number of housing units is always higher as at any given time than the number of households because some housing will be vacant or unutilized. The DOF is responsible for the base projection because they manage population projections for the state, and determine those by analyzing births, deaths and net migration.

\*\* Replacement represents houses that may be demolished or replaced during the cycle\*.

**However, the Dept. of Housing and Community Development has adopted an unusual methodology in evaluating existing need in the 6th housing cycle.**

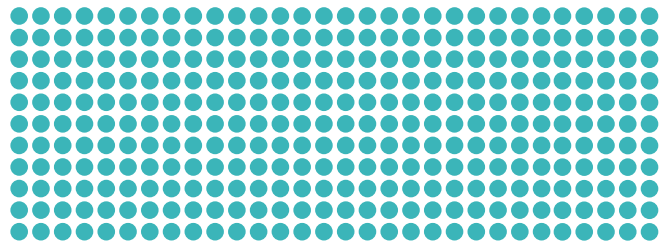
Instead of the typical 1.5% benchmark for owner-occupied housing, they used a 5% vacancy rate usually reserved for rental housing. A 5% vacancy in owner-occupied housing is indicative of a distressed housing market. At 5%, SoCal's existing housing need is increased by 115,000 housing units. Existing need for rental housing is unchanged.

**EXISTING HOUSING: Six SoCal Counties**

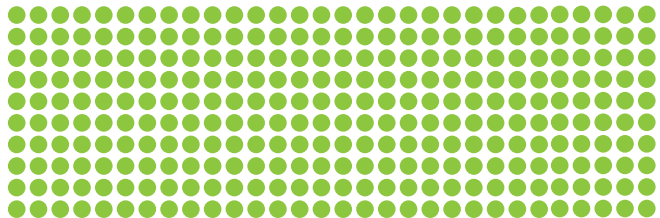
1 circle = 10,000 households

**Occupied Housing Units**

**Home-owned (3.3 Million)**



**Rentals (3 Million)**



**Vacant Housing Units**

**Actual Vacancies (40,000)**

**1.2%**



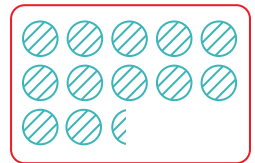
**Healthy Benchmark (165,000)**

**5.0%**



**Existing Need**

**(125,000)**



**=**

**Actual Vacancies (110,000)**

**3.7%**

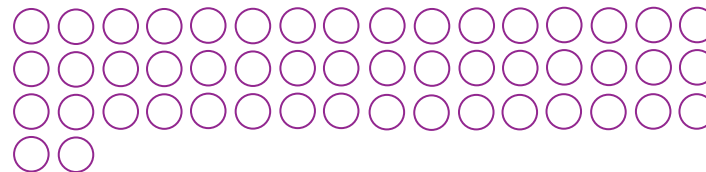


**Healthy Benchmark (149,000)**

**5.0%**



**Seasonal Vacancies (500,000)**

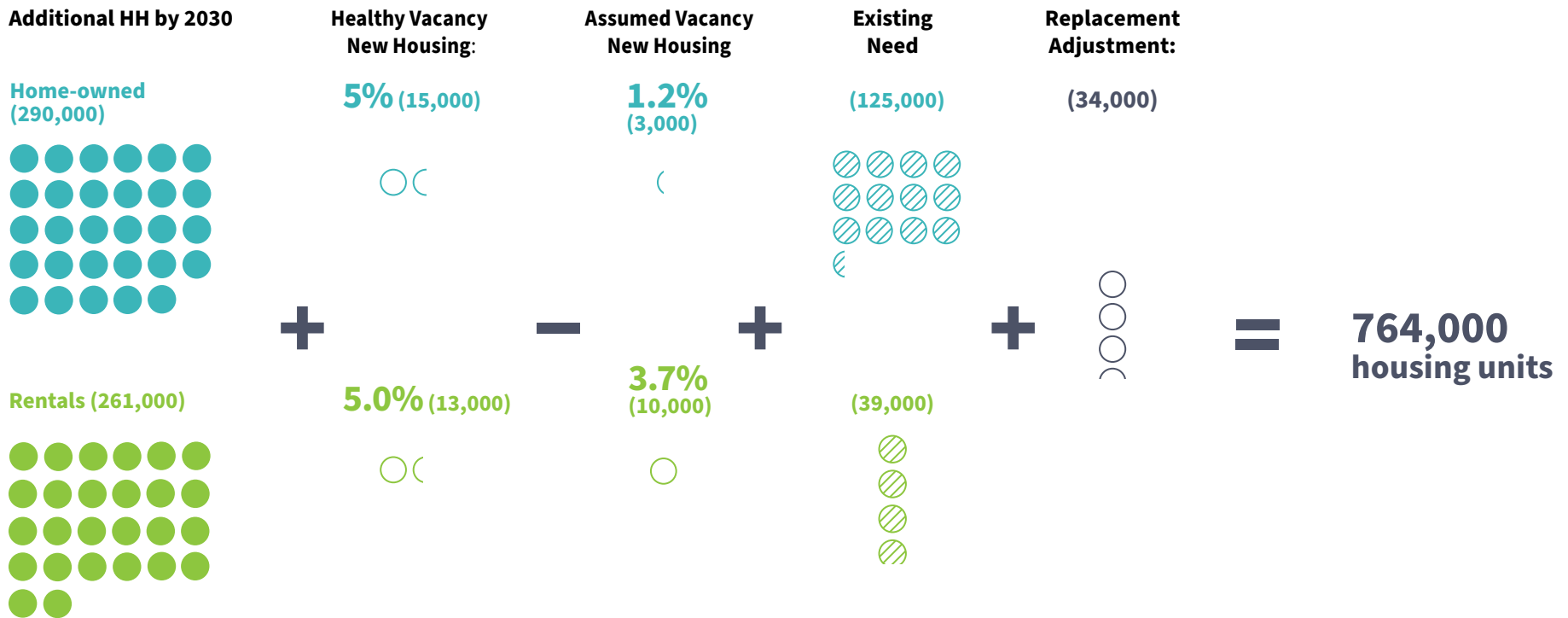


**The Dept. of Housing and Community Development have also taken an unusual approach in evaluating projected housing need.**

Again, instead of using the separate benchmark of 1.5% for owner-occupied housing, 5% was used for all housing. It was also assumed that new projected households had existing vacancies. The full benchmark was not applied to new households. Instead, the difference between the benchmark and the current vacancy rate was applied. The replacement adjustment was applied as it has been in the past.

**PROJECTED HOUSING NEED: Six SoCal Counties**

1 circle = 10,000 households



**Lastly, the Dept. of Housing and Community Development double counted by adding two new factors that had already been factored into household forecasts made by the Dept. of Finance (DOF).**

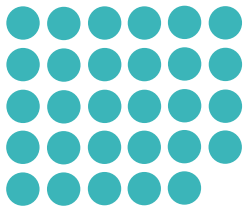
Two new factors were introduced into the 6th assessment – overcrowding and cost burdening. These factors had already been rolled into the DOF’s household projections. The DOF explicitly recognized that regional household formation rates might be depressed (a symptom of overcrowding and cost-burdening) because of the affordable housing crisis. The household formation rate used by the DOF is higher than the actual rate experienced. As such, it generates a higher housing target meant to relieve overcrowding and cost-burdening.

**PROJECTED HOUSING NEED: Six SoCal Counties**

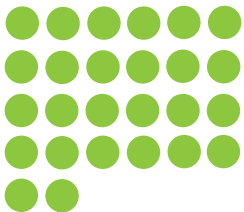
1 circle = 10,000 households

**Additional HH by 2030**

Home-owned  
(290,000)



Rentals (261,000)



**Projected Households already factors in overcrowding and cost-burdening**

From the Department of Finance

“The argument was that the Great Recession and the affordability crisis which impact recent trends in headship should not be allowed to solely dominate the projection, rather some return to underlying socio-cultural norms of homeownership/fewer roommates is a beneficial assumption”



**A DOUBLE COUNT**

Overcrowding Adjustment\*

(460,000)



Cost Burdening Adjustment\*\*

(118,000)



\* In addition to double counting, HCD incorrectly calculated the overcrowding factor. They assumed that for every house that was overcrowded another house would be required to relieve overcrowding. The more accurate analysis would be to assess the number of extra people to be housed and divide by the average household size.  
 \*\* HCD only applied cost-burdening adjustments to future households not existing households. It is unclear why cost-burdening would only be considered an issue for future households, as the data is for current households.

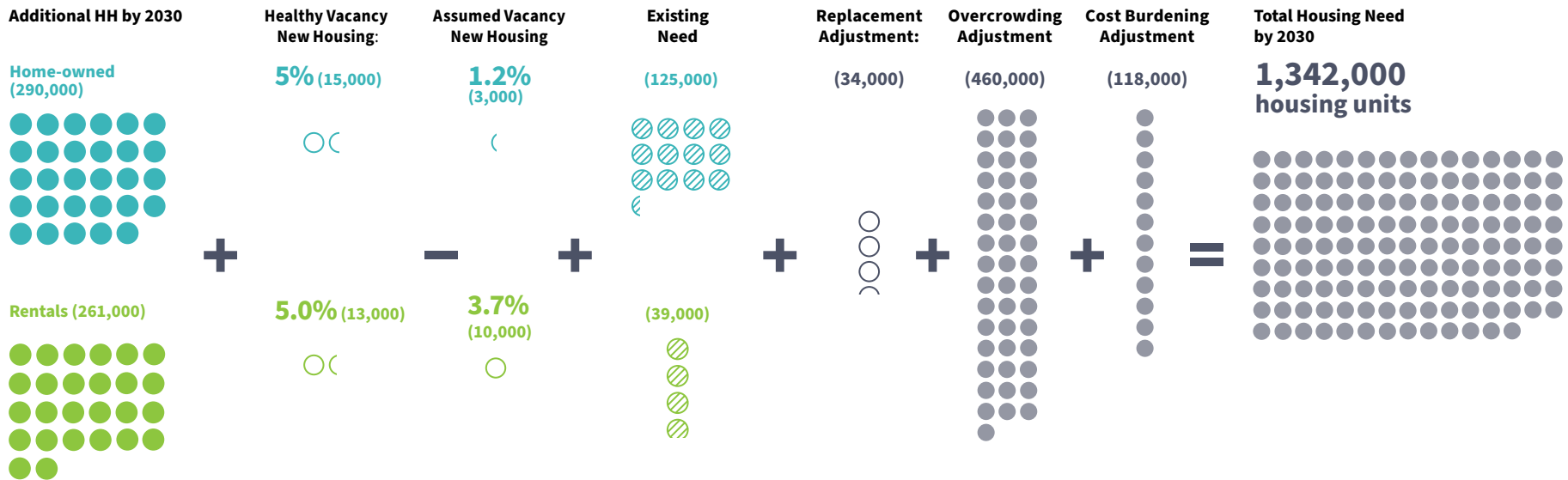
# The vacancy errors and double counting resulted in a doubling of the housing needs assessment for the six counties of SoCal.

## TYPICAL METHODOLOGY

1 circle = 10,000 households



## HCD 6TH CYCLE METHODOLOGY



Complete data tables: *RHNA Data and Models 6th cycle*, [www.embarcaderoinstitute.com](http://www.embarcaderoinstitute.com)

**References used in the analysis :**

**Dept. of Housing and Community Development (HCD)** <https://www.hcd.ca.gov>

**Regional Housing Needs Allocation and Housing Elements**

**Regional Housing Needs**

**Allocations for 6th Cycle Housing Elements:**

- Association of Bay Area Governments Regional Housing Need Determination Plan for the Sixth Housing Element Update
- Sacramento Area Council of Governments Regional Housing Need Determination for the Sixth Housing Element Update
- Southern California Association of Governments Regional Housing Need Determination for the Sixth Housing Element Update
- San Diego Association of Governments Regional Housing Need Determination and Plan for the Sixth Housing Element Update

**Allocations for 5th Cycle Housing Elements:**

- Association of Bay Area Governments (February 24, 2012)
- Sacramento Area Council of Governments (September 26, 2011)
- San Diego Association of Governments (November 23, 2010)
- Southern California Association of Governments (August 17, 2011)

**Annual Progress Reports**

Annual Progress Report APR: 5th Cycle Annual Progress Report Permit Summary (updated 7/30/2020)

**Allocations for Earlier Cycles and Housing Element**

- RHNA 2007-2014 - Housing Methodology Committee Agenda Packet 07-27-06
- Regional Housing Needs Plan 2006 to 2013 SACOG February 2008
- 3rd and 4th Cycle RHNA allocations (data sent in personal communication with the Department of Housing and Community Development)

**Department of Finance Methodology for Household Forecasts**

- "Read Me" P4 Tables : Household Projections 2020 to 2030
- Association of Bay Area Governments Digital Library: RHNA Documents, Regional Housing Needs Allocation Documents
- RHNA 2007-2014 - Housing Methodology Committee Agenda Packet 07-27-06, Regional Housing Need Allocation p 2

**Other Housing Assessment Methodologies**

**"Mckinsey & Company:** A TOOL KIT TO CLOSE CALIFORNIA'S HOUSING GAP: 3.5 MILLION HOMES BY 2025", October 2016

**Jobs to Housing**

Employment Development Department, State of California, Employment Projections : Long Term Projections  
<https://www.labormarketinfo.edd.ca.gov/data/employment-projections.html>

**Data Input and Verification Form**  
**Bottom-Up Local Input and Envisioning Process**  
**2020 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS)**

Date: 09-17-2018

Page 1

A - Contact & Background Information

**This Represents Communication:** From the Jurisdiction of City of Cerritos to SCAG

|   |   |
|---|---|
| <p><b>Jurisdiction Contact Person:</b> <u>Kristin Aguila</u></p> <p><b>Position:</b> <u>Advance Planning Manager</u></p> <p><b>Email:</b> <u>kaguila@cerritos.us</u></p> <p><b>Phone:</b> <u>(562) 916-1201</u></p> | <p><b>Background Information:</b></p> <p><input type="checkbox"/> I am my Jurisdiction's City Manager/County Administrative Officer, Community Development/Planning Director, or City Clerk (submitting on behalf of a jurisdiction's governing body)</p> <p><input checked="" type="checkbox"/> I am a staff person from a local jurisdiction, submitting input under supervision of one of the persons identified above (see appropriate signature below)</p> |
| <p><b>Additional Background, if any, based upon Previous Communications:</b></p> <hr/> <hr/>  |   |

B - Action Items

**We are seeking to (select all that apply):**

**Submit to SCAG:**

Provide Input on SCAG's Core Geographic Data

Provide Input on SCAG's Core Demographic Data

Provide Input on Supplemental Data Elements

Other, please specify \_\_\_\_\_

C - Data Type

**With Relation to SCAG s:**

|  |   |   |   |  |  |  |  |  |  |  |  |  |  |  |  |   |  |   |  |
|--|---|---|---|--|--|--|--|--|--|--|--|--|--|--|--|---|--|---|--|
| <p><b>Core Geographic Data:</b></p> <p><input checked="" type="checkbox"/> General Plan Land Use</p> <p><input checked="" type="checkbox"/> Zoning</p> <p><input checked="" type="checkbox"/> Existing Land Use</p> <p><input checked="" type="checkbox"/> Specific Plan Land Use</p> <p><input type="checkbox"/> Endangered Species and Plants*</p> <p><input checked="" type="checkbox"/> Open Space and Parks*</p> <p><input type="checkbox"/> Flood Areas*</p> <p><input type="checkbox"/> Natural Community and Habitat Conservation Plans*</p> <p style="margin-left: 20px;">Farmland*</p> <p style="margin-left: 20px;">Coastal Inundation (Sea Level Rise)*</p> <p><input checked="" type="checkbox"/> Major Stops and High Quality Transit Corridors*</p> <p><input checked="" type="checkbox"/> Transit Priority Areas*</p> <p><input checked="" type="checkbox"/> Regional Bikeways</p> <p><input type="checkbox"/> Regional Truck Routes</p> <p><input type="checkbox"/> City Boundary*</p> <p style="margin-left: 20px;">Sphere of Influence*</p> <p style="margin-left: 20px;">Census Tracts**</p> <p style="margin-left: 20px;">Transportation Analysis Zone (TAZ) Boundaries**</p> <p style="margin-left: 20px;">Entitlements</p> <p><input checked="" type="checkbox"/> Potential Infill Sites</p>  | <p><b>Core Demographic Data:</b></p> <p><input checked="" type="checkbox"/> Population</p> <p><input checked="" type="checkbox"/> Households</p> <p><input checked="" type="checkbox"/> Employment</p> <p>Year:</p> <p><input type="checkbox"/> 2016</p> <p><input checked="" type="checkbox"/> 2020</p> <p><input checked="" type="checkbox"/> 2030 (Input needed at jurisdictional level only)</p> <p><input checked="" type="checkbox"/> 2035</p> <p><input checked="" type="checkbox"/> 2045</p> <p>Geographic Level:</p> <p><input type="checkbox"/> Jurisdictional Level</p> <p><input checked="" type="checkbox"/> Transportation Analysis Zone (TAZ)</p> <p><input type="checkbox"/> Other Geographic Level (Please Specify): _____</p> |   |   |  |  |  |  |  |  |  |  |  |  |  |  |   |  |   |  |
| <p><b>Supplemental Data Elements (available for review June 2018):</b></p> <table style="width:100%; border: none;"> <tr> <td style="border: none;"><input type="checkbox"/> Zoning Overlay Areas</td> <td style="border: none;"><input type="checkbox"/> Corridor Plans</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Community Design Overlays</td> <td style="border: none;"><input type="checkbox"/> Special Districts</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Community Land Trusts</td> <td style="border: none;"><input type="checkbox"/> Bike/Ped Volume Data***</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Historic Preservation Areas</td> <td style="border: none;"><input type="checkbox"/> Ped Trails/Sidewalk Data***</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Bike Sharing Facilities</td> <td style="border: none;"><input type="checkbox"/> Public Health Data***</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Bike Stations</td> <td></td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Car-Sharing Parking Sites</td> <td></td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Joint Public/Private Developments for Affordable Housing</td> <td></td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Areas with Reduced Parking Minimums and Maximums</td> <td></td> </tr> </table> |   | <input type="checkbox"/> Zoning Overlay Areas | <input type="checkbox"/> Corridor Plans | <input type="checkbox"/> Community Design Overlays | <input type="checkbox"/> Special Districts | <input type="checkbox"/> Community Land Trusts | <input type="checkbox"/> Bike/Ped Volume Data*** | <input type="checkbox"/> Historic Preservation Areas | <input type="checkbox"/> Ped Trails/Sidewalk Data*** | <input type="checkbox"/> Bike Sharing Facilities | <input type="checkbox"/> Public Health Data*** | <input type="checkbox"/> Bike Stations |  | <input type="checkbox"/> Car-Sharing Parking Sites |  | <input type="checkbox"/> Joint Public/Private Developments for Affordable Housing |  | <input type="checkbox"/> Areas with Reduced Parking Minimums and Maximums |  |
| <input type="checkbox"/> Zoning Overlay Areas  | <input type="checkbox"/> Corridor Plans   |   |   |  |  |  |  |  |  |  |  |  |  |  |  |   |  |   |  |
| <input type="checkbox"/> Community Design Overlays   | <input type="checkbox"/> Special Districts  |   |   |  |  |  |  |  |  |  |  |  |  |  |  |   |  |   |  |
| <input type="checkbox"/> Community Land Trusts   | <input type="checkbox"/> Bike/Ped Volume Data***  |   |   |  |  |  |  |  |  |  |  |  |  |  |  |   |  |   |  |
| <input type="checkbox"/> Historic Preservation Areas   | <input type="checkbox"/> Ped Trails/Sidewalk Data***  |   |   |  |  |  |  |  |  |  |  |  |  |  |  |   |  |   |  |
| <input type="checkbox"/> Bike Sharing Facilities   | <input type="checkbox"/> Public Health Data***  |   |   |  |  |  |  |  |  |  |  |  |  |  |  |   |  |   |  |
| <input type="checkbox"/> Bike Stations   |   |   |   |  |  |  |  |  |  |  |  |  |  |  |  |   |  |   |  |
| <input type="checkbox"/> Car-Sharing Parking Sites   |   |   |   |  |  |  |  |  |  |  |  |  |  |  |  |   |  |   |  |
| <input type="checkbox"/> Joint Public/Private Developments for Affordable Housing  |   |   |   |  |  |  |  |  |  |  |  |  |  |  |  |   |  |   |  |
| <input type="checkbox"/> Areas with Reduced Parking Minimums and Maximums  |   |   |   |  |  |  |  |  |  |  |  |  |  |  |  |   |  |   |  |

\* These data elements are maintained by local, state, or federal entities, and SCAG will forward input received from jurisdictions to the appropriate source

\*\* These data elements are being provided as reference information as they are not open to revision (TAZ Boundaries and Census Tracts)

\*\*\* For these elements, SCAG is looking to obtain any available data; local review not needed

Attachment: Data Input and Verification Form (City of Cerritos) (Appeal of the Draft RHNA Allocation for the City of Cerritos)





**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500  
Sacramento, CA 95833  
(916) 263-2911 / FAX (916) 263-7453  
[www.hcd.ca.gov](http://www.hcd.ca.gov)



October 15, 2019

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

Dear Executive Director Ajise,

**RE: Final Regional Housing Need Assessment**

The California Department of Housing and Community Development (HCD) has received and reviewed your objection to the Southern California Association of Governments (SCAG)'s Regional Housing Needs Assessment (RHNA) provided on August 22, 2019. Pursuant to Government Code (Gov. Code) section 65584.01(c)(3), HCD is reporting the results of its review and consideration, along with a final written determination of SCAG's RHNA and explanation of methodology and inputs.

As a reminder, there are several reasons for the increase in SCAG's 6<sup>th</sup> cycle Regional Housing Needs Assessment (RHNA) as compared to the 5<sup>th</sup> cycle. First, as allowed under Gov. Code 65584.01(b)(2), the 6<sup>th</sup> cycle RHNA applied housing need adjustment factors to the region's total projected households, thus capturing existing and projected need. Second, overcrowding and cost burden adjustments were added by statute between 5<sup>th</sup> and 6<sup>th</sup> cycle; increasing RHNA in regions where incidents of these housing need indicators were especially high. SCAG's overcrowding rate is 10.11%, 6.76% higher than the national average. SCAG's cost burden rate is 69.88% for lower income households, and 18.65% for higher income households, 10.88% and 8.70% higher than the national average respectively. Third, the 5<sup>th</sup> cycle RHNA for the SCAG region was impacted by the recession and was significantly lower than SCAG's 4<sup>th</sup> cycle RHNA.

This RHNA methodology establishes the minimum number of homes needed to house the region's anticipated growth and brings these housing need indicators more in line with other communities, but does not solve for these housing needs. Further, RHNA is ultimately a requirement that the region zone sufficiently in order for these homes to have the potential to be built, but it is not a requirement or guarantee that these homes will be built. In this sense, the RHNA assigned by HCD is already a product of moderation and compromise; a minimum, not a maximum amount of planning needed for the SCAG region.

For these reasons HCD has not altered its RHNA approach based on SCAG's objection. However, the cost burden data input has been updated following SCAG's objection due to the availability of more recent data. Attachment 1 displays the minimum RHNA of **1,341,827** total homes among four income categories for SCAG to distribute among its local governments. Attachment 2 explains the methodology applied pursuant to Gov. Code section 65584.01.

The following briefly responds to each of the points raised in SCAG's objection:

Use of SCAG's Population Forecast

SCAG's overall population estimates for the end of the projection period exceed Department of Finance's (DOF) population projections by 1.32%, however the SCAG household projection derived from this population forecast is 1.96% lower than DOF's household projection. This is a result of SCAG's population forecast containing 3,812,391 under 15-year old persons, compared to DOF's population projection containing 3,292,955 under 15-year old persons; 519,436 more persons within the SCAG forecast that are anticipated to form no households. In this one age category, DOF's projections differ from SCAG's forecast by 15.8%.

Due to a greater than 1.5% difference in the population forecast assessment of under 15-year olds (15.8%), and the resulting difference in projected households (1.96%), HCD maintains the use of the DOF projection in the final RHNA.

Use of Comparable Regions

While the statute allows for the council of government to determine and provide the comparable regions to be used for benchmarking against overcrowding and cost burden, Gov. Code 65584.01(b)(2) also allows HCD to "accept or reject information provided by the council of governments or modify its own assumptions or methodology based on this information." Ultimately, HCD did not find the proposed comparable regions an effective benchmark to compare SCAG's overcrowding and cost burden metrics to. HCD used the national average as the comparison benchmark, which had been used previously throughout 6<sup>th</sup> cycle prior to the addition of comparable region language into the statute starting in January 2019. As the housing crisis is experienced nationally, even the national average does not express an ideal overcrowding or cost burden rate; we can do more to reduce and eliminate these worst-case housing needs.

Vacancy Rate

No changes have been made to the vacancy rate standard used by HCD for the 6<sup>th</sup> cycle RHNA methodology.

Replacement Need

No changes have been made to the replacement need minimum of adjustment .5%. This accounts for replacement homes needed to account for homes potentially lost during the projection period.

Household Growth Anticipated on Tribal Lands

No changes have been made to reduce the number of households planned in the SCAG region by the amount of household growth expected on tribal lands. The region should plan for these homes outside of tribal lands.

Overlap between Overcrowding and Cost Burden

No changes have been made to overcrowding and cost burden methodology. Both factors are allowed statutorily, and both are applied conservatively in the current methodology.

### Data Sources

No changes have been made to the data sources used in the methodology. 5-year American Community Survey data allows for lower margin of error rates and is the preferred data source used throughout this cycle. With regard to cost burden rates, HCD continues to use the Comprehensive Housing Affordability Strategy, known as CHAS data. These are custom tabulations of American Community Survey requested by the U.S. Department of Housing and Urban Development. These custom tabulations display cost burden by income categories, such as lower income, households at or below 80% area median income; rather than a specific income, such as \$50,000. The definition of lower income shifts by region and CHAS data accommodates for that shift. The 2013-2016 CHAS data became available August 9, 2019, shortly prior to the issuance of SCAG's RHNA determination so that data is now used in this RHNA.

### Next Steps

As you know, SCAG is responsible for adopting a RHNA allocation methodology for the *projection* period beginning June 30, 2021 and ending October 15, 2029. Pursuant to Gov. Code section 65584(d), SCAG's RHNA allocation methodology must further the following objectives:

- (1) Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very-low income households.
- (2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.
- (3) Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.
- (4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.
- (5) Affirmatively furthering fair housing.

Pursuant to Gov. Code section 65584.04(e), to the extent data is available, SCAG shall include the factors listed in Gov. Code section 65584.04(e)(1-12) to develop its RHNA allocation methodology. Pursuant to Gov. Code section 65584.04(f), SCAG must explain in writing how each of these factors was incorporated into the RHNA allocation methodology and how the methodology furthers the statutory objectives described above. Pursuant to Gov. Code section 65584.04(h), SCAG must consult with HCD and submit its draft allocation methodology to HCD for review.

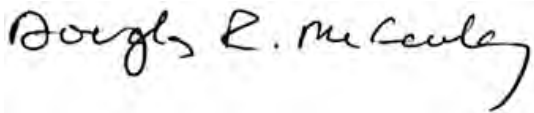
HCD appreciates the active role of SCAG staff in providing data and input throughout the consultation period. HCD especially thanks Ping Chang, Ma'Ayn Johnson, Kevin Kane, and Sarah Jepson.

HCD looks forward to its continued partnership with SCAG to assist SCAG's member jurisdictions meet and exceed the planning and production of the region's housing need. Just a few of the support opportunities available for the SCAG region this cycle include:

- SB 2 Planning Grants and Technical Assistance (application deadline November 30, 2019)
- Regional and Local Early Action Planning Grants
- Permanent Local Housing Allocation

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Megan Kirkeby, Assistant Deputy Director for Fair Housing, at [megan.kirkeby@hcd.ca.gov](mailto:megan.kirkeby@hcd.ca.gov).

Sincerely,



Douglas R. McCauley  
Acting Director

Enclosures

**ATTACHMENT 1**

**HCD REGIONAL HOUSING NEED DETERMINATION**

**SCAG: June 30, 2021 – October 15, 2029 (8.3 years)**

| <u>Income Category</u> | <u>Percent</u> | <u>Housing Unit Need</u>      |
|------------------------|----------------|-------------------------------|
| Very-Low*              | 26.2%          | 351,796                       |
| Low                    | 15.4%          | 206,807                       |
| Moderate               | 16.7%          | 223,957                       |
| Above-Moderate         | 41.7%          | 559,267                       |
| <b>Total</b>           | <b>100.0%</b>  | <b>1,341,827</b>              |
| * Extremely-Low        | 14.5%          | Included in Very-Low Category |

*Notes:*

*Income Distribution:*

*Income categories are prescribed by California Health and Safety Code (Section 50093, et.seq.). Percents are derived based on ACS reported household income brackets and regional median income, then adjusted based on the percent of cost-burdened households in the region compared with the percent of cost burdened households nationally.*

## ATTACHMENT 2

**HCD REGIONAL HOUSING NEED DETERMINATION  
SCAG: June 30, 2021 – October 15, 2029 (8.3 years)**

**Methodology**

| SCAG: June 30, 2021-October 15, 2029 (8.3 Years)<br>HCD Determined Population, Households, & Housing Need |   |   |                                       |  |                  |
|---|---|---|---------------------------------------|--|------------------|
| 1.  | <b>Population: DOF 6/30/2029 projection adjusted +3.5 months to 10/15/2029</b>                  |   |                                       |  | 20,455,355       |
| 2.  | <i>- Group Quarters Population: DOF 6/30/2029 projection adjusted +3.5 months to 10/15/2029</i> |   |                                       |  | -363,635         |
| 3.  | <b>Household (HH) Population: October 15, 2029</b>  |   |                                       |  | 20,079,930       |
|   | <b>Household Formation Groups</b>   | <b>HCD Adjusted<br/>DOF Projected<br/>HH Population</b> | <b>DOF HH<br/>Formation<br/>Rates</b> | <b>HCD Adjusted<br/>DOF Projected<br/>Households</b> |                  |
|   |   | 20,079,930  |                                       | 6,801,760  |                  |
|   | under 15 years  | 3,292,955   | n/a                                   | n/a  |                  |
|   | 15 – 24 years   | 2,735,490   | 6.45%                                 | 176,500  |                  |
|   | 25 – 34 years   | 2,526,620   | 32.54%                                | 822,045  |                  |
|   | 35 – 44 years   | 2,460,805   | 44.23%                                | 1,088,305  |                  |
|   | 45 – 54 years   | 2,502,190   | 47.16%                                | 1,180,075  |                  |
|   | 55 – 64 years   | 2,399,180   | 50.82%                                | 1,219,180  |                  |
|   | 65 – 74 years   | 2,238,605   | 52.54%                                | 1,176,130  |                  |
|   | 75 – 84 years   | 1,379,335   | 57.96%                                | 799,455  |                  |
|   | 85+   | 544,750   | 62.43%                                | 340,070  |                  |
| 4.  | <b>Projected Households (Occupied Unit Stock)</b>   |   |                                       |  | 6,801,760        |
| 5.  | + Vacancy Adjustment (2.63%)  |   |                                       |  | 178,896          |
| 6.  | + Overcrowding Adjustment (6.76%)   |   |                                       |  | 459,917          |
| 7.  | + Replacement Adjustment (.50%)   |   |                                       |  | 34,010           |
| 8.  | <i>- Occupied Units (HHs) estimated (June 30, 2021)</i>   |   |                                       |  | -6,250,261       |
| 9.  | + Cost Burden Adjustment (Lower Income: 10.63%, Moderate and Above Moderate Income: 9.28%)      |   |                                       |  | 117,505          |
| <b>6<sup>th</sup> Cycle Regional Housing Need Assessment (RHNA)</b>                                       |   |   |                                       |  | <b>1,341,827</b> |

**Explanation and Data Sources**

- 1-4. Population, Group Quarters, Household Population, & Projected Households: Pursuant to Government Code Section 65584.01, projections were extrapolated from Department of Finance (DOF) projections. Population reflects total persons. Group Quarter Population reflects persons in a dormitory, group home, institution, military, etc. that do not require residential housing. Household Population reflects persons requiring residential housing. Projected Households reflect the propensity of persons, by age-groups, to form households at different rates based on Census trends.
5. Vacancy Adjustment: HCD applies a vacancy adjustment based on the difference between a standard 5% vacancy rate and the region's current "for rent and sale" vacancy percentage to provide healthy market vacancies to facilitate housing availability and resident mobility. The adjustment is the difference between standard 5% and region's current vacancy rate (2.37%) based on the 2013-2017 5-year American Community Survey (ACS) data. For SCAG that difference is 2.63%.
6. Overcrowding Adjustment: In region's where overcrowding is greater than the U.S overcrowding rate of 3.35%, HCD applies an adjustment based on the amount the region's overcrowding rate (10.11%) exceeds the U.S. overcrowding rate (3.35%) based on the 2013-2017 5-year ACS data. For SCAG that difference is 6.76%.

*Continued on next page*

7. Replacement Adjustment: HCD applies a replacement adjustment between .5% & 5% to total housing stock based on the current 10-year average of demolitions in the region's local

government annual reports to Department of Finance (DOF). For SCAG, the 10-year average is .14%, and SCAG's consultation package provided additional data on this input indicating it may be closer to .41%; in either data source the estimate is below the minimum replacement adjustment so the minimum adjustment factor of .5% is applied.

8. Occupied Units: Reflects DOF's estimate of occupied units at the start of the projection period (June 30, 2021).
9. Cost Burden Adjustment: HCD applies an adjustment to the projected need by comparing the difference in cost-burden by income group for the region to the cost-burden by income group for the nation. The very-low and low income RHNA is increased by the percent difference ( $69.88\% - 59.01\% = 10.88\%$ ) between the region and the national average cost burden rate for households earning 80% of area median income and below, then this difference is applied to very low- and low-income RHNA proportionate to the share of the population these groups currently represent. The moderate and above-moderate income RHNA is increased by the percent difference ( $18.65\% - 9.94\% = 8.70\%$ ) between the region and the national average cost burden rate for households earning above 80% Area Median Income, then this difference is applied to moderate and above moderate income RHNA proportionate to the share of the population these groups currently represent. Data is from 2013-2016 Comprehensive Housing Affordability Strategy (CHAS).

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Ave  
Sacramento, CA 95833-1829  
916) 263-2911 FAX: (916) 263-7453  
www.hcd.ca.gov



December 10, 2020

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

Dear Executive Director Ajise:

**RE: Comment on Appeals of the Draft Regional Housing Need Allocation (RHNA) Plan**

Thank you for the opportunity to comment on the 52 appeals Southern California Association of Governments (SCAG) has received regarding the draft RHNA plan. The appeal process is an important phase in the development of a RHNA plan that ensures that all relevant factors and circumstances are considered.

The only circumstances under which a jurisdiction can appeal are:

- 65584.05(b)(1): The council of governments failed to adequately consider the information regarding the factors listed in subdivision (e) of section 65584.04.
- 65584.05(b)(2): The council of governments failed to determine the share of the regional housing need in a manner that furthers the intent of the objectives listed in subdivision (d) of section 65584.
- 65584.05(b)(3): A significant unforeseen change in circumstances occurred in the local jurisdiction that merits a revision of the information submitted pursuant to subdivision (e) of Section 65584.04.

The California Department of Housing and Community Development (HCD) urges SCAG to only consider appeals that meet these criteria.

Per Government Code section 65584.05(e)(1), SCAG's final determination on whether to accept, reject, or modify any appeal must be accompanied by written findings, including how the final determination is based upon the adopted RHNA allocation methodology, and how any revisions are necessary to further the statutory objectives of RHNA described in Government Code section 65584(d).

Among the appeals based on Government Code section 65584.05(b)(1), several appeals state that SCAG failed to consider the factor described in Government Code section 65584.04(e)(2)(B), citing the lack of land suitable for development as a basis for the appeal. However, this section states the council of governments may not limit its consideration of suitable housing sites to existing zoning and land use restrictions and must consider the potential for increased development under alternative zoning and



land use restrictions. Any comparable data or documentation supporting this appeal should contain an analysis of not only land suitable for urban development, but land for conversion to residential use, the availability of underutilized land, and opportunity for infill development and increased residential densities. In simple terms, this means housing planning cannot be limited to vacant land, and even communities that view themselves as built out must plan for housing through means such as rezoning commercial areas as mixed-use areas and upzoning non-vacant land.

With regard to appeals submitted related to Government Code section 65584.05(b)(2), that SCAG failed to determine the RHNA in a manner that furthers the statutory objectives, it should be noted that HCD reviewed SCAG's draft allocation methodology and found that the draft RHNA allocation methodology furthered the statutory objectives described in Government Code section 65584.

Among the appeals based on Government Code section 65584.05(b)(2), several contend that the cap on units allocated to extremely disadvantaged communities (DACs) does not further RHNA's statutory objectives. This cap furthers the statutory objective to affirmatively further fair housing by allocating more units to high opportunity areas and fewer units to low resource communities, and concentrated areas of poverty with high levels of segregation. Due to the inclusion of this factor, as well as the use of TCAC/HCD Opportunity Maps, SCAG's methodology allocates 14 of the top 15 highest shares of lower-income RHNA to jurisdictions with over 99.95 percent High and Highest Resource areas. With the exceptions of two jurisdictions, the 31 jurisdictions with the highest share of lower-income RHNA are all over 95 percent High and Highest Resource areas. Any weakening of these inputs to the methodology could risk not fulfilling the statutory objective to affirmatively further fair housing.

Several appeals argue that SCAG's RHNA allocation methodology does not adequately promote access to jobs and transit, as required in objectives two and three. HCD's review of SCAG's RHNA methodology found the allocation does further the environmental principles of objective two. SCAG's overall allocation includes significant weight related to the location of high-quality transit areas and the regional distribution of jobs that can be accessed within a 30-minute driving commutes. Regarding objective three, HCD's analysis as to whether jobs-housing fit was furthered by SCAG's draft methodology found that across all jurisdictions there is generally good alignment between low-wage jobs and lower-income RHNA, with all but 15 jurisdictions within a half percent plus or minus difference between their share of lower-income RHNA for the region and their percentage low-wage jobs for the region.

Several appeals are based upon the provision described in Government Code section 65584.05(b)(3), arguing that the COVID-19 pandemic represents a significant and unforeseen change in circumstances that will affect future population and job growth. Ensuring everyone has a home is critical to public health. Reducing and preventing overcrowding and homelessness are essential concerns for every community. The COVID-19 pandemic has only increased the importance that each community is planning for sufficient affordable housing.

Lastly, several appeals state that the Regional Housing Needs Determination (RHND) HCD provided to the SCAG region is too large. SCAG submitted an objection to the RHND at the appropriate time and through the appropriate process. HCD considered those objections and [determined the final RHND for 6<sup>th</sup> Housing Element Cycle for the SCAG region on October 15, 2019](#). There are no further appeal procedures available to alter the SCAG region's RHND for this cycle. Government Code section 65584.05(b) does not allow local governments to appeal the RHND during the 45-day period following receipt of the draft allocation.

HCD acknowledges that many local governments will need to plan for more housing than in the prior cycle to accommodate a RHND that more fully captures the housing need and as the statutory objectives of RHNA shift more housing planning near jobs, transit, and resources. The Southern California region's housing crisis requires each jurisdiction to plan for the housing needs of their community and the region. In recognition of this effort there are more resources available than ever before to support jurisdictions as they prepare to update their 6<sup>th</sup> cycle housing elements:

- SB 2 Planning Grants – \$123 million one-time allocation to cities and counties
- SB 2 Planning Grants Technical Assistance offered to all jurisdictions
- Regional and Local Early Action Planning Grants – \$238 million one-time allocation for local and regional governments
- SB 2 Permanent Local Housing Allocation – approximately \$175 million annually in ongoing funding for local governments to increase affordable housing stock

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Megan Kirkeby, Deputy Director, [megan.kirkeby@hcd.ca.gov](mailto:megan.kirkeby@hcd.ca.gov).



Megan Kirkeby  
Deputy Director



# City of Whittier

13230 Penn Street, Whittier, California 90602-1716  
(562) 567-9320 Fax (562) 567-2872 www.cityofwhittier.org

Electronically Transmitted to: [Housing@scag.ca.gov](mailto:Housing@scag.ca.gov)

December 10, 2020

RHNA Appeals Committee  
Southern California Association of Governments  
900 Wilshire Blvd, Suite 1700  
Los Angeles, CA 90017

**SUBJECT: City of Whittier's Comments on Appeals to the Sixth Cycle Regional Housing Needs Assessment (RHNA) Allocation**

Honorable Chair and Honorable Committee Members:

The City of Whittier ("City") appreciates the challenges that are inherent in allocating 1,341,827 housing units by the thousands (a 226% increase above the baseline 412,137 unit) to cities across Southern California, especially in built-out cities. However, the City is deeply concerned its housing allocation of 3,431 units from the State Department of Housing and Community Development ("HCD") and the Southern California Association of Government's ("SCAG") unit distribution methodology, along with recent housing legislation will fundamentally abridge the City's ability to develop effective land-use policies that are appropriate for managing the community's actual needs. The 878 units in the 5<sup>th</sup> cycle RHNA allocation has been increased by 290% to 3,431 units in the current 6<sup>th</sup> cycle. Particularly challenging in the 6<sup>th</sup> cycle, is the number of low and very low-income units (1,558) which combined with the moderate and above moderate unit totals forces unplanned and unnecessary residential densification of the community.

The affordable units are an unfunded mandate with very limited regional or State financial support for their development. Considering the affordable housing subsidies typically range from \$50,000 to \$250,000 per unit, the overall funding requirements could range from \$78,000,000 to \$390,000,000 which is clearly beyond the reach of the City of Whittier in that the City's general fund budget is just \$72,000,000 which already include \$2,000,000 annually to house the City's unsheltered residents in transitional housing. Additionally, the City only receives 7.5% of each property tax dollar to provide general services including police and library services.

The City is currently in the process of updating its Housing Element as well as the General Plan to incorporate the current RHNA allocation, so Whittier is acutely aware of the various housing needs as well as the potential obstacles, such as aging infrastructure and unplanned density, to creating the requisite housing within a city that

is essentially built out. The changes in the State's housing laws (SB 35, SB 166 and AB 1397) have created additional constraints for the agencies and may severely impact the City's ability to accomplish our regional and local housing goals.

Since development in Whittier began more than 130 years ago, the City is virtually built-out with little developable vacant land outside of its designated open space areas that are dedicated to accommodating existing and future residents. While the City has made significant efforts through its specific plans to densify existing corridors and districts, the majority of Whittier's remaining single-family residential neighborhoods cannot accommodate similar densification. Furthermore, the hills north of Whittier contain regional open space, sensitive habitat and wildlife areas that must be preserved in perpetuity. There are also significant infrastructure and water service constraints that impact Whittier's ability to produce significantly more housing. Although these facts may not be desirable, they must be pragmatically accounted for and mitigated by not further increasing Whittier's share of housing units contained in SCAG's 6<sup>th</sup> Cycle RHNA. The final RHNA allocation and methodology must be fair and equitable while reflecting the capacity for reasonable housing unit construction.

As with many other cities, the City is concerned about the current allocation, but an even greater concern is that additional units may be applied to the City if reallocated from cities that are successful in their appeals. To that end, the City believes the appeal process itself was unclear as to the potential ramifications to other cities and not fully understood.

Although we fully support the surrounding cities in their appeals, the potential for additional units being applied to the City would exacerbate the problems described herein and in Whittier's September 13, 2019 letter to SCAG.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Jeffery S. Adams  
Director of Community Development

File

**From:** Christopher Koontz <Christopher.Koontz@longbeach.gov>  
**Sent:** Thursday, December 3, 2020 11:14 AM  
**To:** Regional Housing  
**Subject:** RHNA Appeals

**Categories:** Response Required, Record

Good morning,

The purpose of this email is to provide the City of Long Beach’s position in regards to pending RHNA appeals before SCAG. The City of Long Beach seeks to meet its housing needs and obligations for the benefit of Long Beach residents and the region. Our allocation was extremely large and presents a planning and financing challenge for the City. Nonetheless we chose not to appeal our allocation because the allocation process was fair and transparent including taking the City of Long Beach’s input into consideration.

We oppose and will not accept any transfer of additional allocation due to the pending appeals. We note that within our area, the Gateway COG, appeals are pending from Bellflower, Cerritos, Downey, Huntington Park, La Mirada, Lakewood, Pico Rivera, and South Gate. Each of these appeals should be evaluated by SCAG on the merits, however Long Beach opposes any transfer of allocation to our City. It would be inappropriate to transfer a further burden to Long Beach when we have already accepted a large allocation and have done more than many cities in the region to accommodate housing growth under the current RHNA cycle, including fully meeting our market-rate RHNA allocation.

The City of Long Beach will continue to work with SCAG and our neighbor jurisdictions to address the housing needs of our residents.

We thank you for consideration and please do not hesitate to contact the City regarding our position.

Christopher Koontz, AICP  
*Deputy Director*

Development Services  
411 W. Ocean Blvd., 3rd Floor | Long Beach, CA 90802  
Office: 562.570.6288 | Fax: 562.570.6068



Attachment: Comments Received During the Comment Period (General) (Appeal of the Draft RHNA Allocation for the City of Cerritos)