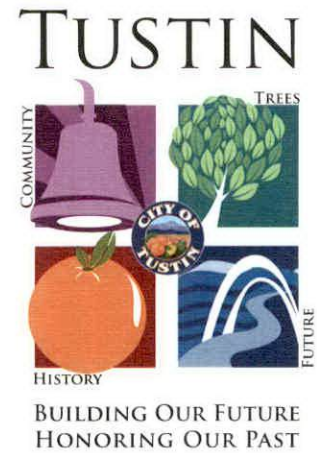


Community Development Department

June 4, 2019

Honorable Peggy Huang, Chair
Community, Economic and Human Development Policy Committee
Regional Housing Needs Assessment Subcommittee
Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017



RE: DRAFT REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) CONSULTATION PACKAGE TO THE CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT (HCD) AND PROPOSED RHNA METHODOLOGY COMPONENTS

Honorable Chair Huang and Honorable Committee Members:

The City of Tustin supports SCAG's ongoing efforts to address California's critical housing needs and appreciates the opportunity to provide comments on the Draft Regional Housing Needs Assessment (RHNA) Consultation Package to the California Department of Housing and Community Development (HCD) and the proposed RHNA methodology components.

As noted in a recent SCAG staff report to the RHNA Subcommittee, the goals for the RHNA consultation process with HCD include the following:

- Follow the SCAG RTP/SCS growth forecasting process, procedure, methodology, and results including bottom up local review, comment and input.
- Provide the best outcomes for the SCAG regional housing needs assessment and determination, meet the requirements of the law, and use the best available statistics and technical methodology.
- Research the appropriate factors and causes associated with existing housing needs.
- Develop policy responses for a long-term robust stable supply of sites and zoning for housing construction.

In light of these goals and the methodology approved in previous RHNA cycles, the City of Tustin has the following comments and concerns regarding the proposed RHNA methodology for the 6th Cycle:

- SCAG should propose to HCD a regional 6th Cycle RHNA determination of no more than 430,000 housing units, which is consistent with local input and already incorporates existing and projected housing need.
- It is unclear how SCAG will address a possible inconsistency between the RHNA determination and the SCAG regional growth forecast and local input, which were used as a basis for the 2020 Regional Transportation Plan (RTP) that is currently in development. The SCAG region potentially could be planning for additional housing, without planning for the transportation network to support the additional housing. If the RTP growth forecast is modified to reflect a RHNA determination by HCD that is inconsistent with local input, the RTP growth forecast would not be based on sound land use planning principles.

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- Action on the proposed social equity adjustment and the 70/30 split for overall population share and population share in High Quality Transit Areas (HQTAs) should be taken after HCD provides SCAG with the RHNA allocation. Jurisdictions are unable to assess the impact of these factors until the regional housing need allocation is confirmed. In addition, basing existing housing need on a jurisdiction's share of population and the presence of HQTAs will result in many housing elements being out of compliance with State law.
- SCAG should provide each jurisdiction with its calculation of the jurisdiction's share of the region's population within HQTAs.
- Existing housing need and the three factors required by State law: overcrowding, cost burden, and healthy vacancy rate, should only be considered for possible inclusion in the disaggregation of the regional total to the jurisdictional level, not as a separate calculation or additive to the regional total; otherwise double counting would occur.

The City of Tustin continues to be a leader in the production of workforce and market rate housing. However, with the dissolution of redevelopment agencies the available funding for affordable housing subsidies has diminished and cities and counties are struggling to meet their RHNA targets. Hopefully, recently enacted funding measures will spur the development of more affordable housing throughout California and result in RHNA targets that are more attainable.

In conjunction with newly adopted housing legislation, the creation of an artificially high RHNA allocation that cannot realistically be implemented will make jurisdictions be subject to State mandates that will thwart housing development.

The City of Tustin urges SCAG to propose a regional 6th Cycle RHNA determination of no more than 430,000 housing units, because such a determination will reflect local input, be reasonable and equitable, be consistent with SCAG's stated goals, and allow communities to have local control over housing development.

Sincerely,



Elizabeth A. Binsack

Community Development Director

cc: Tustin City Council
Kome Ajise, SCAG Executive Director
Marnie Primmer, OCCOG Executive Director
Matthew S. West, City Manager
Justina Willkom, Assistant Community Development Director
Scott Reekstin, Principal Planner