

August 12, 2019

Southern California Association of Governments
Attention: RHNA
housing@scag.ca.gov
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

RE: RHNA Methodology Comments

The City of Yucaipa has reviewed the proposed options for the Regional Housing Needs Assessment (RHNA) process, and is greatly concerned that the methodology for each option would result in a substantial amount of growth in areas that would create a significant increase in Vehicle Miles Travelled (VMT), contrary to state law, and good planning and environmental policies. The City offers a number of comments for consideration as the proposed RHNA methodology is refined.

The proposed options for the RHNA provides some consideration towards providing housing along areas within a High Quality Transit Areas (HQTA), but there should be an increased percentage used in order to prioritize the use of alternative modes of transportation. As SCAG may know, the State of California has made it a priority to mitigate the impacts from climate change, with many laws recognizing that the land use development pattern can play an instrumental role in addressing those impacts. Specifically, SB 375 recognizes that transportation accounts for some 40 percent of greenhouse gas emissions, with cars and light trucks accounting for almost three-quarters of those emissions (30 percent overall). To combat that source, SB 743, was recently adopted that modifies the California Environmental Quality Act (CEQA) thresholds to account for VMTs in assessing transportation-related environmental impacts.

Based on the SCAG Methodology, the current percentage split for development in HQTA would result in a substantial amount of growth where high-quality transit facilities, such as rail and bus services, are nonexistent. The resulting growth then would perpetuate automotive dependent development, and create housing projects that have a higher level of VMTs compared to similarly-sized development in a HQTA. If the RHNA methodology process were to be subject to the CEQA process, the current proposal would result in significant and unavoidable impacts. Further, if the RHNA process were subject to the CEQA process, the alternatives discussion would include a focus towards an increased prioritization to HQTA, and would be determined to be the most environmentally superior and responsible solution.

The City disagrees with the rationale from SCAG regarding their approach in limiting the percentage of housing in HQTA. The rationale provided is that “lower income households tend

to live within an HQTAs while higher income households tend to live in non-HQTAs areas,” and the proposed split is therefore to reduce the overall “higher allocations to areas that have a high concentration of lower income households and possibly perpetuate segregation patterns based on income and indirectly race.” This assessment excludes one key factor: those that cannot afford a car would choose to live in areas where a car is not a necessary means of transportation. The assessment also omits that high income households are also found in areas with the HQTAs. The proposed shift would instead create a new problem: households that are cost burdened by the need and expense of owning and maintaining a car to fulfill the daily needs of a household. Further, areas within HQTAs are more urbanized, and do not feature the same risk of wildfire as more rural and exurban locations.

The City of Yucaipa also questions why the consideration of job locations was not utilized for the RHNA methodology options. Many of the other regional government associations, such as SLOCOG and SANDAG, have included job center locations as a substantive part of their RHNA process. Similar to the focus on HQTAs, adding residences near jobs further reduces VMTs, and also would have the most profound impact towards the cost of housing. In many cases, individuals are required to commute substantial distances as the cost of housing near major employment centers exceeds what is attainable. A concerted effort to bridge the gap with additional housing within proximity to jobs would help alleviate the housing prices, and create a much more reasonable and manageable commute. The cost and time burden for individuals commuting from bedroom communities located far away from job centers should be considered in the RHNA methodology, as it has been for other regions within the state.

The City recommends that the consideration of existing demand be removed from consideration from any of the RHNA methodology alternatives. While the City appreciates the theory behind the approach, the reality is that the approach relies on a number of flawed assumptions to create the baseline for the allocation. This includes the reliance on the rate of building permits issued relative to the region’s rate of permitting. As an example, the City of Yucaipa has been proactive towards approving housing projects. However, outside forces, such as property values, market demand, outside agency permitting fees, state building requirements, increased construction costs, and even international trade policy issues have hindered housing production starts, despite the City having a number of fully-entitled housing projects. Further, the recession during the current housing cycle has further exacerbated the building activity in the City. A methodology that penalizes cities for factors beyond their control seems inappropriate, and many of the factors considered are based on inconsistent and substantially flawed metrics.

As part of the consideration for HQTAs, the methodology should include future transit projects that are currently funded and that will be built within the upcoming housing cycle. As part of a cursory review of the HQTAs maps, it was apparent that there are several projects that are fully funded, and even under construction, that were not included in assessment for defining HQTAs. As these facilities will be built, these jurisdictions should qualify towards the allocation as a HQTAs. This approach provides several key benefits: the assessment would leverage the currently planned facilities, would allow these jurisdictions to be treated fairly like other jurisdictions with HQTAs, and the housing allocation would complement the demand necessary

to sustain this new transit investment. Again, the focus would also encourage development that reduces VMT.

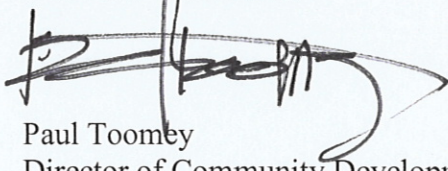
The City recommends that the local input process should be avoided for purposes of calculating the growth and RHNA distribution. In some cases, cities have intentionally adjusted their numbers to be lower in order to “game” the system, and with this approach, a number of jurisdictions would benefit by their act of using artificially low numbers. In addition, these numbers were based upon the RTP/SCS 2045 visioning process. For the City of Yucaipa, our numbers provided were based upon our General Plan. But several critical infrastructure projects are necessary to realize those numbers; there are a number of crucial factors that will determine that rate and timeline of when the growth may actually be able to occur, and several of these factors are beyond the control of the City. However, based on the varied number of assumptions used by all cities, the local input process is not the appropriate factor to determine the regional growth and associated unit allocation process.

The City of Yucaipa would also echo the comments presented by Mayor Bailey of the City of Riverside, stating that there should be a consideration of student housing projects that can count as units towards a City’s annual reporting for their RHNA numbers. The goal of any community should be to provide housing that can serve the market, and cities that have colleges should receive credit for building housing for students, a critical low-income category that has been historically underserved and not counted towards meeting RHNA. However, in recognition of the ever-increasing requirements for meeting the RHNA numbers, cities that invest in providing student housing should be recognized for doing as such.


The City appreciates the efforts of SCAG to manage the difficult process for allocation process for the upcoming housing cycle, and stresses that a focus be provided to ensure housing is built where it can best meet the needs of those looking for homes near jobs, and can reduce VMTs to ensure that the forecasted growth has the least environmental impacts as possible.

Sincerely,

CITY OF YUCAIPA



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