



SOUTHERN CALIFORNIA  
ASSOCIATION OF GOVERNMENTS  
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## SPECIAL MEETING

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

**Remote Participation Only**

**Wednesday, January 6, 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 Tuesday, January 5, 2021.

All written comments received after 5pm on Tuesday, January 5, 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

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## PUBLIC HEARING – SPECIAL MEETING AGENDA

Southern California Association of Governments  
Remote Participation Only  
**Wednesday, January 6, 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 Tuesday, January 5, 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 5, 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 12/29/2020.

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 seven (7) 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 Barstow\*
  - 1.2 City of Chino\*
  - 1.3 City of Chino Hills\*
  - 1.4 City of Fontana\*
  - 1.5 City of Hemet\*
-



1.6 County of Riverside\*

1.7 City of Calipatria\*

**\* 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 8, 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

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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 12/29/20)

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 12/29/20)

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 12/29/20)

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 12/29/20)

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

Written Comments Received on the 6th Cycle RHNA (as of 12/29/20)

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

Written Comments Received on the 6th Cycle RHNA (as of 12/29/20)

Date of Letter	Organization	Name	Topic(s)
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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Date of Letter	Organization	Name	Topic(s)
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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Date of Letter	Organization	Name	Topic(s)
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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Date of Letter	Organization	Name	Topic(s)
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

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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

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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, 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

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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), Larry K. McCallon (City of Highland), Deborah Robertson (City of Rialto), Carmen Ramirez (City of Oxnard), Steve Manos (City of Lake Elsinore), Karen 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 Moatazedi	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 12/29/20)

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 Mhramian	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 12/29/20)

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 6, 2021

**To:** Regional Housing Needs Assessment (RHNA) Appeals Board

**EXECUTIVE DIRECTOR'S  
APPROVAL**

**From:** Michael Gainor, Senior Regional Planner,  
(213) 236-1822, Gainor@scag.ca.gov

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

**RECOMMENDED ACTION:**

Deny the appeal filed by the City of Barstow (the City) to reduce its Draft RHNA Allocation by 635 housing units, from 1,516 units to 881 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 Barstow requests a reduction of its RHNA allocation by 635 units (from 1,516 units to 881 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 (AFFH)
- 3. High housing cost burdens

**RATIONALE FOR STAFF RECOMMENDATION:**

Staff have reviewed the appeal and recommend no change to the City of Barstow’s Draft RHNA Allocation. The City’s first issue, which is an objection to the adopted Final RHNA Methodology developed for the 6<sup>th</sup> Cycle RHNA, and proposal of an alternative methodology to reflect the City’s unique circumstances, may not be considered a basis for appeal. Issue 2, the City’s request to reduce their RHNA allocation based on AFFH factors, was already addressed through the application of the social equity adjustment, which had been included in the City’s Draft RHNA Allocation. Lastly, the City’s third issue regarding the consideration of high cost burdens associated with new housing development, may not be considered by SCAG as a justification for a reduction since the RHNA allocation does not establish a building quota and does not impede the City from the use of alternative zoning strategies to accommodate its allocated housing need.

**BACKGROUND:**

**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*



### **Draft RHNA Allocation**

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

#### **Total RHNA for the City of Barstow: 1,516 units**

- Very Low Income: 171 units
- Low Income: 227 units
- Moderate Income: 299 units
- Above Moderate Income: 819 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 the California Department of Housing and Community Development (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 Barstow. 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 Barstow is requesting a modification of its RHNA allocation based on its objection to SCAG's adopted RHNA methodology. The City provided an alternative methodology which includes consideration of the City's average percentage of population growth over ten years and average*

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household size. Assuming an optimistic one percent population growth rate for the city, Barstow is requesting a revised RHNA allocation of 881 units (60 very low income, 60 low income, 234 moderate income, and 527 above moderate income), representing a 635-unit reduction from its Draft RHNA Allocation.

**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 the opportunities provided to local jurisdictions to participate in the development of the RHNA methodology. The Final RHNA Methodology was adopted by the SCAG Regional Council on March 5, 2020 and describes the various policy factors by which housing unit need is to be allocated across the region; for example, anticipated household growth, access to jobs and transit, and housing 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 RHNA objectives<sup>1</sup> in large part due to its use of objective factors and, as such, SCAG may not consider factors differently in one jurisdiction versus another.

An appeal citing the adopted RHNA methodology as its basis must refer to the application of the methodology, not the methodology itself. An example of an improper application of the adopted RHNA methodology might be a data error which was identified by a local jurisdiction. The City of Barstow has not provided evidence of such a data error or any other misapplication of the adopted RHNA methodology, and therefore, the City may not appeal under this basis. Moreover, appeals shall be based upon comparable data available for all affected jurisdictions and accepted planning methodology and supported by adequate documentation. The basis for the City’s proposed alternative allocation methodology and supporting data does not meet this requirement. Finally, the City has failed to explain why its proposed revision is necessary to further the intent of the objectives listed in Government Code section 65584(d). For these reasons, SCAG staff does not recommend a reduction to Barstow’s draft RHNA allocation based on this issue.

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

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<sup>1</sup> The five RHNA objectives are: 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, protection of environmental and agricultural resources, encouragement of efficient development patterns, and achievement of the region’s greenhouse gas (GHG) emissions reduction targets as established by the California Air Resources Board (CARB) 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)).

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*The City of Barstow asserts that, based on AFFH parameters, the City's share of very low-income households already exceeds one-third of its total population, and therefore, the City should receive a reduction of the RHNA allocation.*

**SCAG Staff Response:** 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”. While SCAG staff accepts the assertion that Barstow currently has a disproportionately high percentage of lower income households in comparison to San Bernardino County (59 percent and 41 percent, respectively), the RHNA methodology 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 AFFH, the RHNA methodology includes a minimum 150 percent social equity adjustment, and an additional 10 to 30 percent 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 for each defined income category. It does so by adjusting current household income distribution in comparison to the countywide 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 Barstow, 11 percent of the jurisdiction's draft RHNA allocation is assigned for the very low-income category, which is lower than its current 42 percent and lower than the San Bernardino County distribution of 25 percent. 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 Barstow's draft RHNA allocation based on this issue.

**Issue 3:** High Housing Cost Burdens [Government Code Section 65584.04(e)(6)].

*The City of Barstow asserts that recent state housing legislation requiring the installation of solar panels, electric vehicle hookups, and fire sprinklers in non-fire prone areas, increases the cost of building a single-family home by about 10 percent. This effectively reduces a developer's ability to invest in the City. The City has an abundant amount of affordable land available to build housing but without investors, it'll be difficult to meet the RHNA allocation. The City believes that if restrictions were lifted, Barstow would be in a better position to meet its RHNA allocation.*

**SCAG Staff Response:** Construction costs cannot be considered by SCAG as a justification for a reduction since the purpose of a RHNA allocation is to ensure that there is adequate zoning to accommodate housing need. The full text of this factor: “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” refers to the proportion of renter

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households who are considered cost-burdened for housing. It does not refer to the cost of construction.

The City acknowledges that much of the market rate housing is within the range of affordability and that it is easy to get section 8 housing due to low rental prices. However, there is little demand for purchasing homes. Neither of these facts support this high housing cost burden factor. For these reasons, SCAG staff does not recommend a reduction to Barstow's draft RHNA allocation based on this issue.

**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 Barstow)
2. City of Barstow RHNA Appeal Request Form
3. City of Barstow RHNA Appeal Letter
4. Comments received during the comment period
5. Map of High Quality Transit Areas (HQTAs) in the City of Barstow (2045)
6. Map of Job Accessibility in the City of Barstow (2045)

## 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 Barstow 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 Barstow'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 in preparation for development of Connect SoCal and the 6<sup>th</sup> cycle of RHNA.<sup>1</sup> Each jurisdiction was provided with a package of local 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 focused principally on jurisdiction-level and Transportation Analysis Zone (TAZ) level growth, input on specific parcels, sites, and project areas was 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 precisely reflected the jurisdiction-level growth totals provided during this process.

The local input data included SCAG's preliminary growth forecast information. For the City of Barstow, the projected number of households in 2020 was 9,435, and in 2030 was 11,382 (growth of 1,947 households). In March 2018, SCAG staff met with City of Barstow staff to discuss the Bottom-Up Local Input and Envisioning Process and to answer questions. Input from the City of Barstow on the growth

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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 may be found in Connect SoCal Master Response 1:

[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 reviewed during this process may be found in each jurisdiction's Draft Data/Map Book:

<http://scagrtpscs.net/Pages/DataMapBooks.aspx>

forecast was received in October 2018. Following this input, household totals for Barstow were revised to 9,030 in 2020, and to 10,560 in 2030, reflecting a projected growth reduction of 1,530 households for the City over this ten-year period.

**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 AB 2158 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 Barstow 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 obtained through the Bottom-Up Local Input and Envisioning Process, and also features strategies for growth at the TAZ-level to reduce greenhouse gas (GHG) emissions from automobiles and light trucks to help achieve the SCAG region’s GHG reduction targets, as established 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, may be 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 local jurisdictions to provide TAZ-level technical refinements on the topics of general plan capacities and entitlements. With the release of the draft Connect SoCal, 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 (SPM-DM) site:

<http://spmdm.scag.ca.gov>

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 Barstow 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 the California Department of Housing and Community Development (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: <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 relied 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 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 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 Final RHNA 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 Barstow**

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

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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 (“existing need”) and would not result in a change in regional population. For further discussion, see Connect SoCal Master Response 1:

[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>Barstow city statistics and inputs:</b>	
Forecasted household (HH) growth, RHNA period: <i>(2020-2030 Household Growth * 0.825)</i>	1262
Percent of households who are renting:	55%
Housing unit loss from demolition (2009-18):	23
Adjusted forecasted household growth, 2020-2045: <i>(Local input growth forecast total adjusted by the difference between the RHNA determination and SCAG's regional 2020-2045 forecast, +4%)</i>	3,963
Percent of regional jobs accessible in 30 mins (2045): <i>(For the jurisdiction's median TAZ)</i>	0.28%
Jobs accessible from the jurisdiction's median TAZ (2045): <i>(Based on Connect SoCal's 2045 regional forecast of 10.049M jobs)</i>	28,000
Share of region's job accessibility (population weighted):	0.00%
Jurisdiction's HQTAs population (2045):	4,202
Share of region's HQTAs population (2045):	0.04%
Share of population in low/very low-resource tracts:	99.87%
Share of population in very high-resource tracts:	0.00%
Social equity adjustment:	180%

<b>Calculation of Draft RHNA Allocation for Barstow city</b>	
Forecasted household (HH) growth, RHNA period:	1262
Vacancy Adjustment <i>(5% for renter households and 1.5% for owner households)</i>	43
Replacement Need	23
<b>TOTAL PROJECTED NEED:</b>	<b>1328</b>
Existing need due to job accessibility (50%)	16
Existing need due to HQTAs pop. share (50%)	172
Net residual factor for existing need <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>	0
<b>TOTAL EXISTING NEED</b>	<b>188</b>
<b>TOTAL RHNA FOR BARSTOW CITY</b>	<b>1516</b>
Very-low income (<50% of AMI)	172
Low income (50-80% of AMI)	227
Moderate income (80-120% of AMI)	299
Above moderate income (>120% of AMI)	818

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 HQTAs and population forecasts. With a forecasted 2045 population of 4,202 living within HQTAs, the City of Barstow will represent 0.04 percent of the SCAG region’s total 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 commute time. Since over 80 percent of the region’s workers live and work in different jurisdictions, the adopted 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 located within 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 job accessibility. From the City of Barstow's median TAZ, it will be possible to reach 0.28 percent of the region's jobs in 2045 within a 30-minute automobile commute (28,000 jobs), based on Connect SoCal's 2045 regional job forecast of 10,049,000 jobs,

Please note that the above represents only a partial description of the key data and calculations included 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 June 15, 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: 9/15/2020 Jurisdiction Subject to This Appeal Filing: \_\_\_\_\_  
*(to file another appeal, please use another form)*

Filing Party (Jurisdiction or HCD)  
City of Barstow

Filing Party Contact Name: Rebecca Thorpe Merrell Filing Party Email: rthorpe@barstowca.org

**APPEAL AUTHORIZED BY:**

Name: Nikki Salas

**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 June 15, 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.**

We would like to appeal based on

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.

Affirmatively Furthering Fair Housing (AFFH)

"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"

Barstow City has an existing 30% of the population that is below the poverty line which it argues is disproportionately high. The City of Barstow submits that it's final RHNA number should include only 1-5% of very low income 1-5% of low income 60-80% moderate income and 20-50% above moderate income.

The City of Barstow would also like to base it's appeal on high housing cost burdens imposed by the state

The City of Barstow is very interested in building small starter single family homes for working professionals and feels that the state is discouraging developers by increasing the cost of building homes by 10% with solar & other requirements.

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

- Total - 881
- Very Low Income - 60
- Low Income - 60
- Moderate Income - 234
- Above moderate income - 527

**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. BarstowRHNA10.08.2020 - Separate Document Attached
- 2.
- 3.

**FOR STAFF USE ONLY:**

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



October 8, 2020

Southern California Association of Governments  
3403 Tenth St #805  
Riverside, CA 92501

RE: City of Barstow RHNA Appeal

**The City of Barstow appeals its current RHNA number**

Total - 1516 Very-low income - 171 Low income - 227 Moderate income - 299  
Above moderate income - 819

Based on Local planning factors and information on affirmatively furthering fair housing (AFFH), we would like to argue that our percentage of very low income already exceeds 1/3 of the population and should only be 5% of the RHNA allocation.

We would appeal that our population has decreased but this is not a factor of appeal in the 6<sup>th</sup> Cycle.

**The City of Barstow submits that it's modified RHNA be 881 dwelling units  
Split into the following categories of**

**Total - 881**  
**Very Low Income - 60**  
**Low Income - 60**  
**Moderate Income - 234**  
**Above moderate income - 527**

**Numbers Justification Population**

The population in Barstow is 23,916 people. In the last 10 years the population has increased 0.52% or 0.0052. In the last two years the population has decreased by -.135% or -0.00135.

Using the 10-year average of 0.52% as a population increase, we would have 1,273 additional people. The average household size in Barstow is 2.84. This is from 2014-2018 (US Census). 2.84 is slightly below the California average household. Using these numbers Barstow would need 448 additional households by 2029.

Using the optimistic number of 1% growth in Barstow we would have an additional population of 2502 people. Using Barstow's average household of 2.84, Barstow would need 881 dwellings.

Attachment: City of Barstow RHNA Appeal Letter (Appeal of the Draft RHNA Allocation for the City of Barstow)



We submit this number of 881 dwellings as our Modified RHNA number, which is assuming twice as much growth as the average growth experienced over the last 10 years.

**Income**

The median household income is \$39,585. This is low compared to California's \$75,277.

Persons in poverty 36%, which is over 1/3 of our population. There is a significant amount of section 8 housing because rent is low. Many of the high-end jobs such as the hospital workers in Barstow commute from neighboring communities such as Victorville, Apple Valley and Hesperia. In multiple studies, we have received feedback that some working professionals who commute here want new single-family homes. Most of the available housing in Barstow is from the 50's and 60's.

Barstow's priority is to create new attractive single-family residential housing for the working professionals.

Using the previous method of allocating population percentages in income categories for 881 homes would be.

- Very Low Income 94
- Low Income 123
- Moderate Income 167
- Above moderate income 497

**Our preferred numbers would be**

- Very Low Income 60**
- Low Income 60**
- Moderate Income 234**
- Above moderate income 527**

**Affordable Housing**

Cost of building – an affordable single-family residential house can cost around \$190 thousand to the homeowner if they build an 1835 square foot-tract home.

Extra laws in the last few years such as requiring solar panels, EV car hookups, fire sprinklers in non-fire prone areas as well as other small costs adds at least an additional \$22 thousand to the cost of building a single-family home. This means that building legislation adds between 9 and 10% to the cost to a small home, driving up the final cost above what is considered affordable. Considering that most homes built in the Barstow area are this type of small single family residential; these extra legislations have reduced the likelihood of building



desired housing by commercial developers in Barstow. Most single-family homes built in the area are from the 50's and 60's.

The only people who build single family residential homes now are publicly funded projects and those wealthy enough to pay the extra fees. Those who can afford these fees often build outside of Barstow on large pieces of land.

Developers call weekly or bi-weekly if they can build tiny houses because these buildings do not have solar requirements. Tiny homes are able to avoid state regulations, but they are not the type of housing that working professionals want.

The City of Barstow believes that we would be in a better position to meet our RHNA number, if restrictions were lifted for houses under 1900 square feet and under .2 of an acre, so that these houses are no longer required to have solar panels (\$15 thousand), Electric Vehicle hookups, or indoor fire sprinklers in areas not fire prone due to desert that lacks vegetation.

If Barstow was free to lift these regulations in areas that are desirable for development such as around the community college, the City would likely see a boom in housing production.

### **Employment**

Barstow is a driving distance of 114 miles and a time distance of 1hr 40 minutes during light traffic and 2 hours and 30 minutes during a morning commute with no accidents to arrive in the Greater Los Angeles area. Due to this extreme distance to the Greater Los Angeles area Barstow does not appeal as a commuter town into the Greater Los Angeles area.

Barstow has a great asset of cheap and available land. The city of Barstow is trying to attract manufacturing employers to the area. An increase of employment opportunities may raise the city's population to the optimistic growth of 1%, but no developers interested in buying land are likely to begin hiring until after 2029. Accompanying workers are unlikely to affect this 6th RHNA cycle. Without an increase of employment opportunities Barstow is unlikely to grow in population.

### **Available Housing**

Much of the market rate housing is within the range of affordability. Barstonian Apartments offers two-bedroom units between \$825 to 1,075 a month Zillow/Trulia 8/31/2020. Rates range anywhere from \$425 to 995 per month for a one-bedroom apartment. Studio apartments range between \$399-450 per month for a studio to \$1,200-1,600 per month for a four-bedroom house.





We do admit there are 264 homes for sale on Trulia but only 8 available to rent. This is reflective of the fact that it is easy to get section 8 housing due to low rental prices and so most houses rent but also due to the section 8 tenants there are few homeowners in the older areas of the city. Most homeowners have moved to Apple Valley/Hesperia. We are keen on changing this fact and bringing homeowners into Barstow by building new housing or finding funds to support the renovation of old housing.

## Statistics

**Table A-6: Housing Composition in Barstow**

Housing Products	2000		2010		2017	
	Number of Units	Percent of Units	Number of Units	Percent of Units	Number of Units	Percent of Units
<b>Single-Family Units</b>						
- Single-Family Detached	5,042	57%	5,446	57%	5,532	57%
- Single-Family Attached	252	3%	202	2%	202	2%
<b>Multi-Family Units</b>						
- Multi-Family (2-4 units)	1,096	12%	1,330	14%	1,326	14%
- Multi-Family (5 or more)	1,488	17%	1,742	18%	1,742	18%
<b>Mobile Homes</b>	965	11%	835	9%	854	9%
<b>Total</b>	8,843	100%	9,555	100%	9,656	100%
Sources: California Department of Finance, 2000, 2010 and 2017						

The city has plenty of affordable land and vast areas zoned for housing. When we receive applications, we process them in two weeks and work with landowners to get the building plans up to code. Some of the housing tract plans on file were designed at the expense of the city in an attempt to help the landowner move to completion of the housing process. We are pro-growth, but the demand is not present.

Should you have any additional questions, please contact my office at;

220 E Mountain View  
 Barstow CA, 92311  
 (760) 256-3531 Ext 5153

Sincerely,

Rebecca Thorpe Merrell  
 Contract Planner  
 City of Barstow

**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 (Appeal of the Draft RHNA Allocation for the City of Barstow)

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.

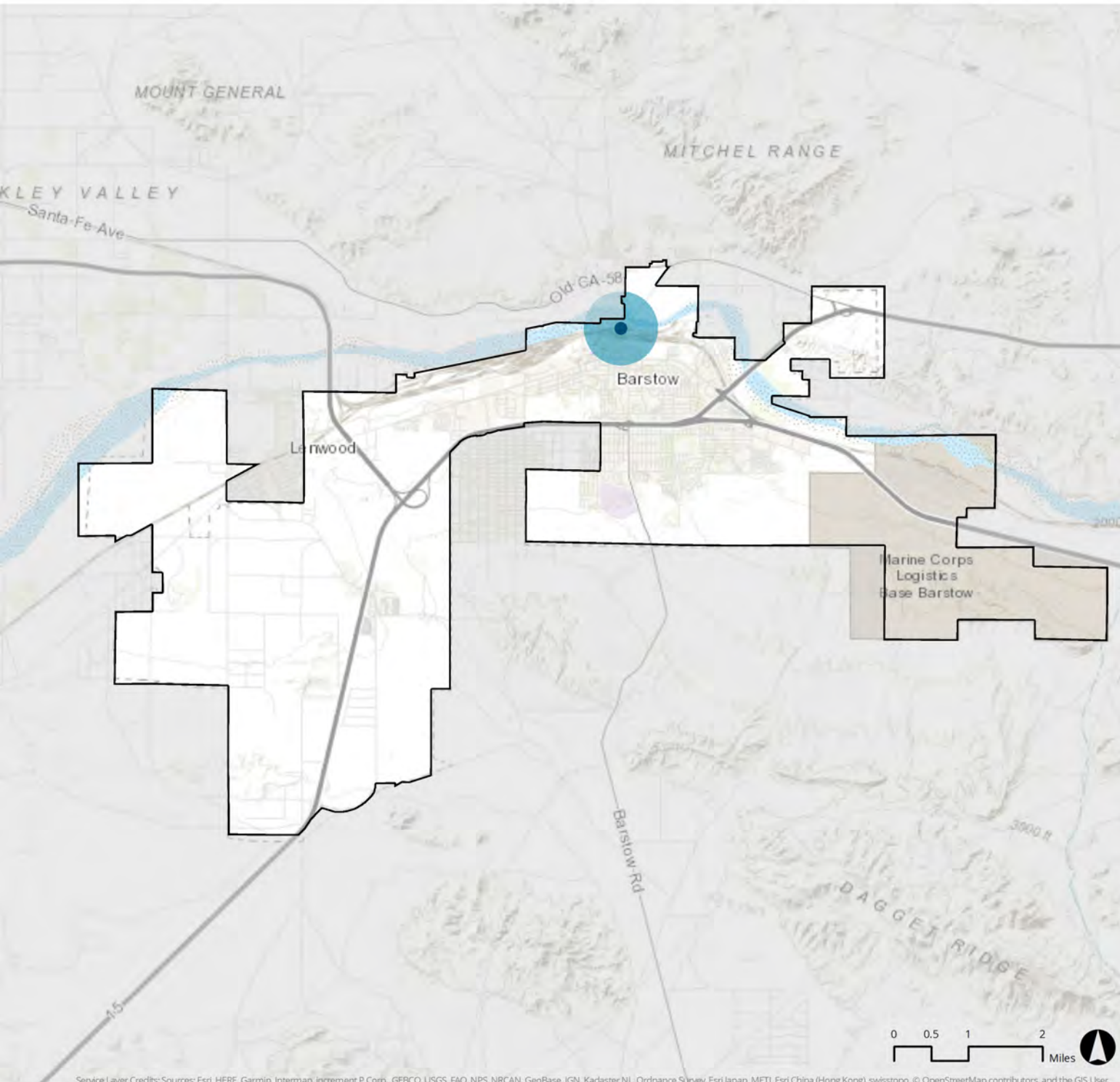
We thank you for consideration and please do not hesitate to contact the City regarding our position.

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 (Appeal of the Draft RHNA Allocation for the City of Barstow)



## Major Transit Stops and High Quality Transit Areas in City of Barstow [Year 2045]

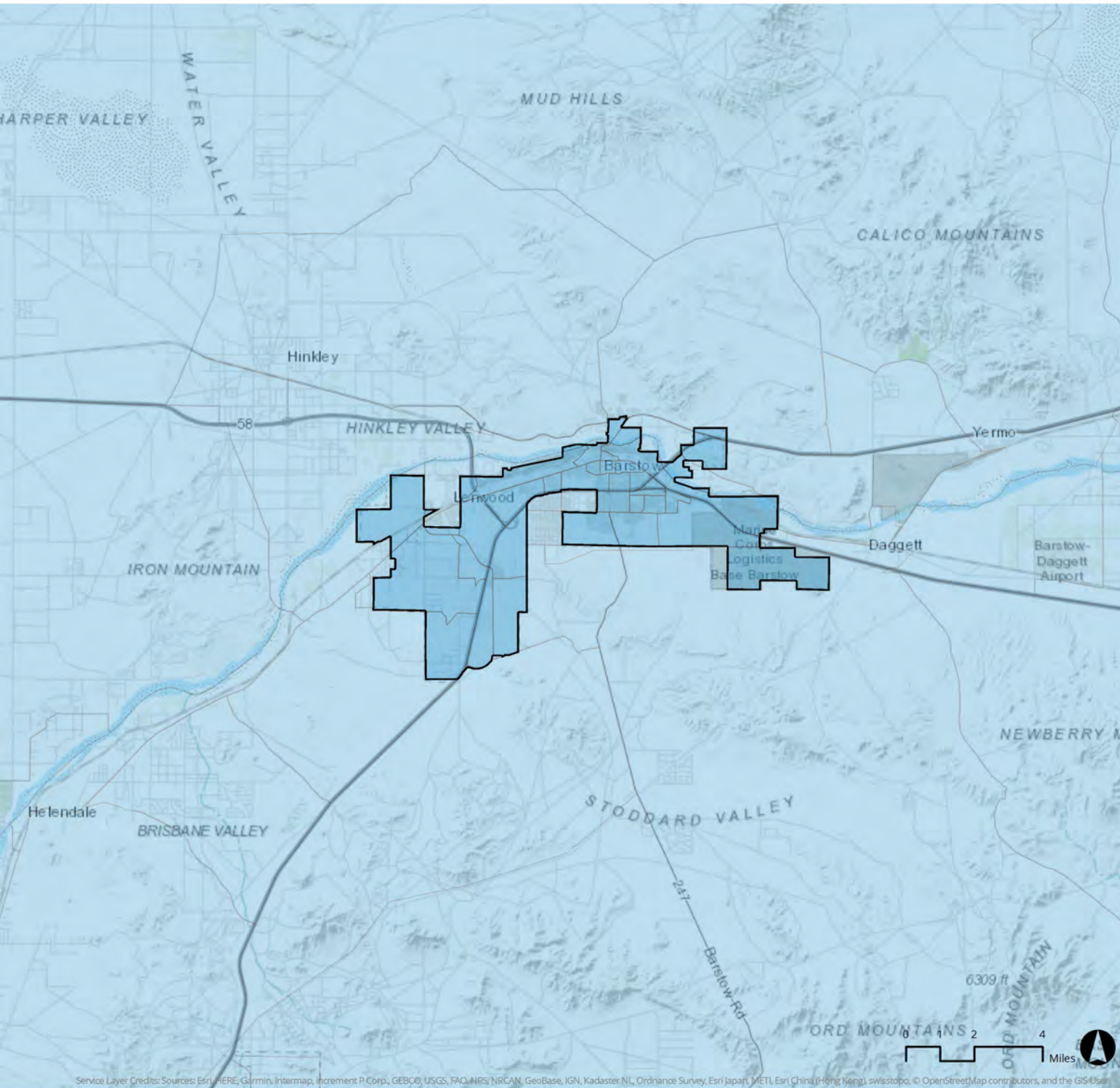
- Major Transit Stops
- ⚡ High Quality Transit Corridors (HQTCS)
- High Quality Transit Areas (HQTAs)

Note: SCAG identifies Major Transit Stops and High Quality Transit Corridors (HQTCS), and their surrounding areas in one-half mile radius distance as specified in Section 21155.(b)(3). Major transit stops and HQTCS are extracted from 2045 plan year data of Connect SoCal. SCAG's High Quality Transit Area (HQTA) is within one-half mile from Major Transit Stops and HQTCS and developed based on the language in SB375; however, freeway transit corridors with no bus stops on the freeway alignment do not have a directly associated HQTA. The RHNA process, per Section 65584 et seq., specifies that SCAG's housing needs allocation plan shall further several objectives including those related to infill development and jobs-housing balance. To that end, SCAG's Regional Council-adopted 6th Cycle Final RHNA Methodology relies on a jurisdiction's forecasted 2045 population within HQTAs to allocate housing need.

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

Disclaimer: The information shown on this map reflect jurisdiction's input submitted during the Local Input and Envisioning Process for the City of Barstow. SCAG shall not be responsible for user's misuse or misrepresentation of this map. For the details regarding the sources, methodologies and data please refer to the SCAG Data/Map Book at [connectsocial.org/Pages/Local-Input-Process.aspx](https://connectsocial.org/Pages/Local-Input-Process.aspx) or contact [RTPLocalInput@scag.ca.gov](mailto:RTPLocalInput@scag.ca.gov).





## TAZ-level job accessibility in and around: City of Barstow [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, methods of this map, please refer to the SCAG Data/Map Book at <https://www.connectsocial.org/Pages/Local-Input-Process.aspx> or contact RTPLocalIn



Southern California Association of Governments  
Remote Participation Only  
January 6, 2021

**To:** Regional Housing Needs Assessment (RHNA) Appeals Board

**EXECUTIVE DIRECTOR'S  
APPROVAL**

**From:** Kevin Kane, Senior Regional Planner,  
(213) 236-1828, kane@scag.ca.gov

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

**RECOMMENDED ACTION:**

Deny the appeal filed by the City of Chino (the City) to reduce its draft RHNA allocation from its current allocation of 6,961 units to 3,397 units, a reduction of 3,564 units (51.2 percent).

**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 Chino requests a reduction of its RHNA allocation of 6,961 residential units based on the following nine issues:

- 1) Jobs/housing balance
- 2) Sewer and water infrastructure limitations
- 3) Availability of suitable land for urban development or conversion to residential use
- 4) Lands protected from urban development under existing federal or state programs
- 5) Distribution of household growth assumed for purposes of comparable Regional Transportation Plans
- 6) Regional greenhouse gas emission reduction targets
- 7) Application of adopted Final RHNA Methodology for the 6<sup>th</sup> Cycle RHNA: Furthering statutory housing equity objectives
- 8) Application of adopted Final RHNA Methodology for the 6<sup>th</sup> Cycle RHNA: Determining populations located within an HQTAs
- 9) Change in circumstances

**RATIONALE FOR STAFF RECOMMENDATION:**

Staff have reviewed the submitted appeal documentation and recommend no change to the City 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*

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Chino RHNA allocation.

**Issue 1:** The appeal based on the jobs-housing balance factor was not demonstrated to be an impediment to meeting Chino's RHNA allocation since jobs-housing balance is evaluated at the regional, not jurisdictional, level.

**Issue 2:** The appeal based on limitations on the availability of existing water and sewage infrastructure is not accepted because these conditions have already been accounted for in the RHNA assessment.

**Issue 3:** The appeal based on the availability of land suitable for urban development or conversion to residential use is not accepted because RHNA requires that the consideration of the availability of land suitable for urban development must include other types of land use opportunities other than vacant land.

**Issue 4:** The appeal based on lands protected from urban development by existing federal or state programs is not accepted as RHNA requires that other types of land use options be considered in the assessment of housing development opportunities other than existing open space.

**Issue 5:** The appeal based the distribution of household growth assumed for purposes of comparable Regional Transportation Plans is not accepted because, while SCAG's 2020 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal) is informed by data for projected housing need through 2045, the 6th Cycle RHNA assessment includes both projected regional housing need and existing regional housing need.

**Issue 6:** The appeal based on regional greenhouse gas (GHG) emission targets is not accepted since Connect SoCal has demonstrated achievement of all applicable regional GHG emission reduction targets.

**Issue 7:** The appeal based on the improper application of the adopted RHNA methodology for furthering statutory housing equity objectives is not accepted because the City's inability to allay the costs associated with the implementation of the equitable distribution of housing supply and its limited land resources available to develop the needed housing units does not provide an eligible basis for appeal since RHNA requires a local jurisdiction only to plan and zone for its determined housing need and does not require a local jurisdiction to develop the allocated units.

**Issue 8:** The appeal based on the improper application of the adopted RHNA methodology relating to the determination of population residing within an HQTAs is not accepted because the adopted RHNA methodology considers only planned future (2045) HQTAs and the City is anticipated to have

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HQTAs in 2045 based on eligible transit routes projected to be in service on Euclid Avenue and on Edison Avenue.

**Issue 9:** The appeal based on a change in local circumstances is not accepted since no evidence was provided to indicate that the City of Chino is disproportionately burdened by COVID-19 impacts relative 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 of the draft RHNA allocation for the City of Chino is provided below.

**Total RHNA Allocation for the City of Chino: 6,961 units**

Very Low Income: 2,107 units

Low Income: 1,281 units

Moderate Income: 1,201 units

Above Moderate Income: 2,372 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 Chino. 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: The City contends that SCAG failed to adequately consider information related to existing or projected jobs-housing balance [Government Code Section 65584.04(e)(1)].***

*Government Code Section 65584.04(e)(1) indicates that, to the extent sufficient data is available, the following factor shall be included in developing the RHNA methodology:*

*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.*

*The jobs/housing balance in the City of Chino would be negatively impacted with the influx of new residential units as provided in the current RHNA allocation. Most Chino residents commute to work in other cities and adding more residential units would increase the discrepancy between housing and jobs in the City.*

***SCAG Staff Response:*** Jobs/housing balance is most effectively assessed at a regional scale, extending beyond the boundaries of any individual jurisdiction. Over 80 percent of workers in the SCAG region live and work in different jurisdictions, a figure that accounts for those who work from home. This requires an approach to the region's jobs/housing relationship based on an assessment of access to regional jobs rather than on the number of jobs located within a particular jurisdiction. Limiting the scope of a jobs/housing balance evaluation to an individual jurisdiction's boundaries may effectively worsen a regional jobs/housing imbalance. Therefore, SCAG staff does not recommend a reduction to the City of Chino's draft RHNA allocation based on this factor.

***Issue 2: The City contends that SCAG failed to adequately consider information related to sewer and water infrastructure constraints [Government Code Section 65584.04(e)(2)(A)].***

*Government Code Section 65584.04(e)(2)(A) indicates that, to the extent sufficient data is available, the following factor shall be included 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*

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*providing necessary infrastructure for additional development during the planning period.*

*Sewer and water infrastructure limitations within the City of Chino are not conducive to the development of the number of new housing units currently allocated through RHNA. Many of the water and sewage utility agencies that serve Chino residents are located outside of the City, and Chino has limited control over the infrastructure expansion decisions made by these external agencies.*

**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 decisions that would prevent the jurisdiction from providing the necessary infrastructure. In addition, costs to upgrade and develop appropriate water and sewage infrastructure may not be considered by SCAG as a justification for a reduction since the RHNA allocation only requires a jurisdiction to plan and zone for its determined housing need and is not required to actually develop the allocated units. For these reasons, SCAG staff does not recommend a housing need reduction based upon this planning factor.

**Issue 3: The City contends that SCAG failed to adequately consider information related to availability of land suitable for urban development or for conversion to residential use [Government Code Section 65584.04(e)(2)(B)].**

*Government Code Section 65584.04(e)(2)(B) indicates that, to the extent sufficient data is available, the following factor shall be included in developing the RHNA methodology:*

*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.*

*The City of Chino has limited availability of suitable land for urban development or conversion to residential use. Development of the small amount of existing open space within the City is largely curtailed by flood control restrictions, freeway right of way, institutional use, and aviation safety requirements.*

**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. For these reasons, SCAG staff does not recommend a reduction to the City of Chino’s RHNA allocation based on this factor.

**Issue 4: The City contends that SCAG failed to adequately consider information related to lands protected from urban development under existing federal or state programs [Government Code Section 65584.04(e)(2)(C)].**

*Government Code Section 65584.04(e)(2)(C) indicates that, to the extent sufficient data is available, the following factor shall be included in developing the RHNA methodology:*

*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.*

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*There are undeveloped lands within the City of Chino that are protected from urban development under existing federal or state programs. Specifically, the City includes areas that are designated as flood plain zones and wildlife habitat preservation areas. These conditions restrict the City's ability to develop the housing allocated by RHNA.*

**SCAG Staff Response:** It is presumed that planning factors such as lands protected by federal and state programs have already been accounted for prior to the local input submitted to SCAG since such factors are required to be considered at the local level. No evidence was submitted in the appeal that indicates that the status of these areas has changed since the most current input provided in 2018. In addition, while the City of Chino has indicated it cannot accommodate units in these specific areas, sufficient evidence has not been provided to indicate that the City may not 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 housing need elsewhere. For these reasons, SCAG staff does not recommend a reduction to the City of Chino's RHNA allocation based on this factor.

**Issue 5: The City contends that SCAG failed to appropriately apply the adopted Final RHNA Methodology for the 6th Cycle RHNA (2021-2029) [Government Code Section 65584.05 (b)(1)] and that SCAG failed to adequately consider information related to distribution of household growth assumed for purposes of comparable Regional Transportation Plans [Government Code Section 65584.04(e)(3)].**

*The City of Chino's draft allocation of 6,961 units over the eight-year RHNA planning period is more than twice the number of new units (3,437) forecasted in the 2020 RTP/SCS for the City through the year 2030. This more than doubling of the number of housing units required to be developed will have an impact on the RTP/SCS as it relates to existing infrastructure not only in the City of Chino, but throughout San Bernardino County.*

**SCAG Staff Response:** The appeal based the distribution of household growth assumed for purposes of comparable Regional Transportation Plans is not accepted because, while SCAG's 2020 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal) is informed by data for projected housing need through 2045, the 6th Cycle RHNA assessment includes both projected regional housing need and existing regional housing need. Projected need is intended to accommodate expected growth of population and households, while existing need reflects the latent housing demand of the current regional population. SCAG has allocated both projected housing need and existing housing need in a manner that is consistent with the development pattern defined by Connect SoCal. The 'projected need' element of the 6th Cycle RHNA is specifically based on the regional development pattern defined in Connect SoCal. The 'existing need' allocation element of RHNA, though not part of Connect SoCal, is also consistent with the Connect SoCal development pattern. SCAG's adopted RHNA methodology allocates 'existing need'

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based on factors related to transit and job accessibility. Accordingly, existing need is aligned with the strategies and policies underlying the development pattern in the SCS. In summary, SCAG has allocated total regional housing need (both 'existing need' and 'projected need') consistent with the regional development pattern defined in Connect SoCal. Therefore, SCAG staff does not recommend a reduction to Chino's draft RHNA allocation based on this factor.

**Issue 6: The City contends that SCAG failed to adequately consider information related to the region's greenhouse gas (GHG) emission reduction targets [Government Code Section 65584.04(e)(12)]:**

*Government Code Section 65584.04(e)(12) indicates that, to the extent sufficient data is available, the following factor shall be included in developing the RHNA methodology:*

*The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080.*

*Achievement of regional GHG emission targets will be negatively impacted by the current RHNA allocation for the City of Chino. Adding new housing units in areas where there are no available jobs will result in increased VMT and GHG emissions.*

**SCAG Staff Response:** The 6th cycle RHNA does not change the regional population forecast from Connect SoCal either in 2029 (end of RHNA period) or for any other year during the Connect SoCal growth forecast, including 2035 for which Connect SoCal is required to meet the applicable regional GHG emissions reduction target. While RHNA would require housing units to address existing need over its eight-year planning period, in addition to the growth forecast to address projected need, those additional housing units are intended to serve the existing population and would, therefore, not result in additional regional GHG emissions as argued by the City in its appeal. Since the allocation methodology for existing need is based on transit and job accessibility, it promotes a more efficient development pattern in utilizing public transit, reducing commute distance, and contributing to reduction in regional per capita GHG emissions.

In fact, increasing housing opportunities in location efficient areas is a primary strategy in Connect SoCal for reducing regional GHG emissions. Location efficiency refers to areas where single occupancy vehicle travel is minimized as a result of being near high quality transit amenities or being located near high demand travel destinations, including major employment centers. Correspondingly, RHNA allocations are assigned to jurisdictions based on job accessibility and transit accessibility. Job accessibility is measured as jobs accessible to a jurisdiction's residents within a 30-minute commute based on the number and location of jobs in 2045 as determined by the SCAG Regional Growth Forecast. Transit accessibility is measured by a jurisdiction's share of

regional population that reside within an HQTAs using the 2045 Growth Forecast population projections and the HQTAs locations used for Connect SoCal.

Given the more efficient development pattern, per capita GHG emissions would be reduced in a manner that is consistent with the SCS for meeting the regional GHG emissions targets established by CARB. For this reason, SCAG staff does not recommend a reduction to the City of Chino's draft RHNA allocation based on this factor.

**Issue 7: The City contends that SCAG failed to appropriately apply the adopted Final RHNA Methodology for the 6th Cycle RHNA (2021-2029) [Government Code Section 65584.05 (b)(1)] and that SCAG failed to adequately consider local factors information related to the statutory housing equity objectives in Government Code Section 65584(d)(1)-(3).**

*Government Code Section 65584(d)(1)-(3) indicates that the RHNA shall further each 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.*

*The RHNA allocation for the City of Chino would negatively impact the objective of increasing the supply and mix of housing supply in an equitable manner due to the lack of available funding for the development of the allocated affordable housing units. The City has limited ability to develop affordable housing at the allocated number of units due to lack of funding for affordable housing and the loss of redevelopment funding. There is a lack of available land (over 100 acres would be needed) to accommodate the allocated number of affordable units based on default densities and number of required units. The requirement for the City to comply with the no-net loss law (SB 166) may result in land not being developed for either low-income housing or housing at higher densities due to the lack of replacement land if market-rate housing is desired on specific parcels of land. This*

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*may result in land remaining undeveloped for any type of housing. Furthermore, the areas with available land could result in the affordable units being concentrated in one area of the City and not disbursed in an equitable manner throughout the City.*

**SCAG Staff Response:** Costs incurred to develop and construct the allocated new housing units within a jurisdiction may not be considered by SCAG as a justification for a RHNA reduction since the RHNA allocation does not provide a building quota or mandate. A local jurisdiction is only required to plan and zone for its determined housing need and is not required to develop the allocated units.

**Issue 8:** *The City contends that SCAG failed to appropriately apply the adopted Final RHNA Methodology for the 6th Cycle RHNA (2021-2029) in regard to the allocation of existing need. The distribution of household growth was improperly applied for the City of Chino, specifically regarding population living within 'High Quality Transit Areas' (HQTAs). The City does not currently include any areas that may be properly designated as an HQTA as defined in the SCAG RTP/SCS.*

**SCAG Staff Response:** The RHNA existing need allocation is assigned to jurisdictions based on job accessibility and transit accessibility. Job accessibility is measured as the number of regional jobs accessible to a jurisdiction's residents within a 30-minute commute, based on the number and location of jobs in 2045 from the Growth Forecast. Transit accessibility is measured as a jurisdiction's share of the total regional population residing within an HQTA in 2045 using the 2045 population projections from the Growth Forecast and the HQTA locations used in support of Connect SoCal. The adopted RHNA methodology considers only planned future (2045) HQTAs. While the City currently has no designated HQTAs, Connect SoCal indicates that in the future the City will have HQTAs, with eligible transit routes expected to be in service on Euclid Avenue and on Edison Avenue in the City of Chino by 2045. For this reason, SCAG staff does not recommend a reduction to the City of Chino's draft RHNA allocation based on this factor.

**Issue 9:** *The City contends that SCAG failed to consider changed circumstances [Government Code 65584.05(b)].*

*The COVID-19 pandemic has resulted in potentially significant unknown changes in circumstances to the development of housing throughout California. Creating more housing, likely at higher densities for affordable housing, may present a challenge due to needs for social distancing and other concerns related to disease spread. The nature of work and the types of jobs available may also have long-ranging impacts on housing allocation and transportation infrastructure in the region.*

**SCAG Staff Response:** The COVID-19 pandemic has produced many impacts throughout the SCAG region. However, it has not resulted in a slowdown in major construction nor has it resulted in a decrease in 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 reflective of need that covers an eight-year period and is not impacted by immediate near-term circumstances.

SCAG's Regional Council delayed adoption of the 2020-2045 RTP/SCS (Connect SoCal) 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, Connect SoCal's long-range (2045) forecast of population, employment, and household growth remained unchanged. The Connect SoCal 'Demographics and Growth Forecast' Technical Report<sup>1</sup> outlines the process for forecasting long-range employment growth, which involves the evaluation of national growth trends and regional economic competitiveness factors, including the SCAG region's share of national employment growth. Short-term economic forecasts commenting on COVID-19 impacts generally do not provide a basis for changing the region's long-term economic competitiveness or its employment outlook for 2023-2045. As such, SCAG's assessment is that comparable data does not suggest long-range regional employment impacts due to the pandemic.

Moreover, impacts from COVID-19 are not unique to any individual jurisdiction in the SCAG region, and no evidence has been provided in the appeal to indicate that housing need within the City of Chino is disproportionately impacted relative 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 response to this factor.

**FISCAL IMPACT:**

Work associated with this item is included in the current FY 2020-21 Overall Work Program (300-4872Y0.02: Regional Housing Needs Assessment).

**ATTACHMENT(S):**

1. Local Input and Development of Draft RHNA Allocation (City of Chino)
2. City of Chino Appeal Request Form and Supporting Documentation
3. Map of High Quality Transit Areas (HQTAs) in the City of Chino
4. Map of Job Accessibility in the City of Chino
5. Comments Received During the Comment Period

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<sup>1</sup> [https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal\\_Demographics-And-Growth-Forecast.pdf](https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal_Demographics-And-Growth-Forecast.pdf)

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

This attachment describes the nature and timing of the opportunities provided to the City of Chino to offer information and local input on SCAG's growth forecast, the draft RHNA methodology, and the Growth Vision in support of SCAG's 2020 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal). It also describes how the RHNA methodology development process integrated this information to develop the City of Chino'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 development of 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. In April 2018, SCAG staff met with City of Chino staff to discuss the Bottom-Up Local Input and Envisioning Process and to answer questions. For the City of Chino, the projected number of households in 2020 was 24,586 and in 2030 was 27,983 (growth of 3,397 households).

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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:

[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 reviewed during this process may be found in each jurisdiction's Draft Data/Map Book:

<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 Chino 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 to reduce greenhouse gas (GHG) emissions from automobiles and light trucks to help achieve the SCAG region's GHG emissions reduction targets, as established 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, may be accessed 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, 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 (SPM-DM) site at: <http://spmDM.scag.ca.gov>.

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 Chino and incorporated them into the Growth Vision in July 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 the California Department of Housing and Community Development (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: <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 (HQTAs) population 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 obtained through Connect SoCal’s 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 Final RHNA 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 Chino

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

<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 (“existing need”) and would not result in a change in regional population. For further discussion, see Connect SoCal Master Response 1:

[https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal\\_Public-Participation-Appendix-2.pdf](https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal_Public-Participation-Appendix-2.pdf)



RHNA methodology yields the draft RHNA allocation for the City of Chino as summarized in the data and calculations provided in the following tables.

City of Chino Statistics and Inputs		Calculation of Draft RHNA Allocation for Chino	
Forecasted household (HH) growth, RHNA period: <i>(2020-2030 Household Growth * 0.825)</i>	2,803	Forecasted household (HH) growth, RHNA period:	2,803
Percent of households who are renting:	37%	Vacancy Adjustment: <i>(5% for renter households and 1.5% for owner households)</i>	78
Housing unit loss from demolition (2009-18):	62	Replacement Need:	62
Adjusted forecasted household growth, 2020-2045: <i>(Local input growth forecast total adjusted by the difference between the RHNA determination and SCAG's regional 2020-2045 forecast, +4%)</i>	8,815	TOTAL PROJECTED NEED:	2,943
Percent of regional jobs accessible in 30 mins (2045): <i>(From the jurisdiction's median TAZ)</i>	11.68%	Existing need due to job accessibility (50%):	2,175
Jobs accessible from the jurisdiction's median TAZ (2045): <i>(Based on Connect SoCal's 2045 regional forecast of 10.049M jobs)</i>	1,174,000	Existing need due to HQTAs pop. share (50%):	1,502
Share of region's job accessibility (population weighted):	0.52%	Net residual factor for existing need: <i>(Negative values reflect a cap on lower-resourced community with good job and/or transit access. Positive values represent the amount being redistributed to higher-resourced communities based on their job and/or transit access)</i>	342
Jurisdiction's HQTAs population (2045):	36,717	TOTAL EXISTING NEED:	4,020
Share of region's HQTAs population (2045):	0.36%	<b>TOTAL RHNA FOR THE CITY OF CHINO:</b>	<b>6,961</b>
Share of population in low/very low-resource tracts:	0.00%	Very-low income (<50% of AMI):	2,107
Share of population in very high-resource tracts:	16.52%	Low income (50-80% of AMI):	1,281
Social equity adjustment:	150%	Moderate income (80-120% of AMI):	1,201
		Above moderate income (>120% of AMI)	2,372

The transit accessibility measure is based on the population projected to live within designated 'High Quality Transit Areas' (HQTAs) in 2045 based on Connect SoCal's designation of HQTAs and population forecasts. With a forecasted 2045 population of 36,717 living within HQTAs, the City of Chino will represent 0.36 percent of the SCAG region's total 2045 HQTAs population, which provides the basis for allocating housing units based on transit accessibility.

Job accessibility is defined as a jurisdiction's share of regional jobs that are accessible within a 30-minute commute time. 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 travel demand model output for the year 2045 rather than assigning housing units based on the number of jobs located

within a specific jurisdiction. Specifically, the share of future (2045) regional jobs which may be reached within a 30-minute automobile commute time from a local jurisdiction's median TAZ is used to allocate housing units based on the job accessibility factor. From the City of Chino's median TAZ, it will be possible to reach 11.68 percent of the region's jobs in 2045 within a 30-minute automobile commute (1,174,000 jobs), based on Connect SoCal's 2045 regional job forecast of 10,049,000 jobs.

Please note that the above represents only a partial description of the key data and calculations featured 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: \_\_\_\_\_

EUNICE M. ULLOA  
Mayor

TOM HAUGHEY  
Mayor Pro Tem



MARK HARGROVE  
MARC LUCIO  
PAUL A. RODRIGUEZ Ed.D.  
Council Members

MATTHEW C. BALLANTYNE  
City Manager

## CITY of CHINO

October 21, 2020

Ma' Ayn Johnson, Senior Housing and Land Use Planner  
Southern California Association of Governments  
Attention: RHNA  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, CA 90017

RE: 6th Regional Housing Needs Assessment (RHNA) Allocation Appeal Request

Dear Ms. Johnson:

On behalf of the residents of the City of Chino (City), the following appeal is being submitted to the Southern California Association of Governments (SCAG) pursuant to Government Code Section 65584.05 requesting a revision of the City's share of the Final Draft RHNA Allocation (Final Draft Allocation), released on September 3, 2020, which is based on the final Regional Housing Needs Assessment (RHNA) methodology for the 6<sup>th</sup> Housing Element Cycle (2021-2029) for the Southern California Region.

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.

### A. INTRODUCTION

The City's appeal is based on SCAG's adopted basis for appeal methodology as outlined in the following section; specifically, that SCAG failed to consider information submitted, including:

- Methodology related to High-Quality Transit Corridors (HQTC's) in the City;
- Availability of sewer and water infrastructure;
- Availability of suitable land for urban development or for conversion to residential use;
- Land that is protected from urban development due to state and federal programs; and
- Potential growth limits due to Regional Transportation Plans.

Additionally, SCAG failed to determine Chino's share of the RHNA in accordance with the information described in Government Code Section 65584.04, and in a manner, that furthers, and does not undermine, the intent and objectives listed in Government Code Section 65584 (d).

The current draft RHNA allocation for the City is 6,961 units, which include 3,387 low and very-low income units. The City sent letters on September 13, 2019 and November 6, 2019 (attached) that stated that during the current eight-year RHNA 5<sup>th</sup> Cycle, the City experienced significant



growth and facilitated the construction of over 2,940 residential units, of which 340 are affordable units. The current Draft Allocation would require the City to build 1.3 times as many affordable units in the next 6<sup>th</sup> Cycle. Additionally, the total number of units allocated to the City is 2.4 times the number of homes that have been constructed to date in the current 5<sup>th</sup> Cycle.

In 2018, the City worked with SCAG to provide input on the draft 2020 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). That input included the number of households that are forecasted to be constructed in the City between 2020 and 2045. The number estimated for 2020 is 24,586 households and 27,983 households in 2030, a difference of 3,397 households in a ten-year time frame. The draft RHNA allocation of 6,961 units is more than double the number of units forecasted for the 2020 RTP/SCS, which estimates an increase of 3,397 units to be developed in the City over ten years (2020-2030).

The doubling of Draft RHNA Allocated units/households in comparison to the RTP/SCS will have a significant impact on the State's goals and the goals of the RTP/SCS of reducing vehicle miles traveled (VMT) and greenhouse gas emissions (GHG). Additionally, the 2020 RTP/SCS identifies needed regional roadway infrastructure and funding to support that infrastructure, it does not consider the additional units required in the Draft Allocation, resulting in insufficient transportation planning.

In addition, the current COVID-19 pandemic has added several unforeseen aspects to the RHNA methodology that SCAG has been developing over the last several months. There are many unknowns on what the ultimate impact the pandemic will have on the economy; particularly jobs; changes in where people will live and how they will want to live; the increased ability to work from home and teach children at home; reduced use of public transportation; etc.

The City also acknowledges, in accordance with Government Code Section 65584.04(g)(1), that local growth control measures cannot be a basis for appeal. However, the City of Chino's Measure M, approved by the voters in 1988, restricts the ability of the City Council to increase residential density on parcels without approval of a majority of the voters. This creates additional hurdles to the City's ability to provide available sites based upon the enormous allocation that is proposed.

As the City begins to embark on developing the 6<sup>th</sup> Cycle Housing Element, one of the most important aspects is stakeholder engagement throughout the process. For the Housing Element, stakeholders are primarily residents and business owners within the City. CDC and local guidance related to COVID-19 limit the City's ability to conduct in-person outreach to gather vital stakeholder input. Engaging stakeholders throughout the process provides great value to the final product. Without robust stakeholder engagement, the ability to provide a well vetted Housing Element will make it difficult for decision makers to be confident in the plan. It is likely that the community as a whole will agree that these unknowns make it far too challenging to fully plan for this next 8-year cycle, especially with the draft RHNA allocation of 6,961 units.

## **B. BASIS OF APPEAL**

**1. Summary of basis of appeal** – The basis of the appeal relates to the Final Draft Allocation and SCAG's failure to take into account issues that are specifically related to the City of Chino. Several factors noted below undermine and do not further the intent and objectives listed in Government Code Section 65584(d). Additionally, there are flaws with the RHNA methodology as it relates to High-Quality Transit Areas (HQTAs) and change in circumstances related to the pandemic.

**2. Grounds for Chino appeal** – Pursuant to Government Code Section 65584.05(b)(2), the City appeals the Draft Allocation based on SCAG's failure to determine the City's share of the regional housing need in accordance with the information described herein, and the SCAG methodology established pursuant to Government Code Section 65584.04 and in a manner that furthers, and does not undermine, the intent of the objectives listed in Government Code Section 65584(d).

**Local Planning Factors per Government Code Section 65584.04(e).**

**1. SCAG failed to adequately consider information related to Government Code Section 65584.04(e)(1).**

The statutory factor that SCAG was required to include under Government Code Section 65584.04(e)(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.*

According to SCAG's 2019 Local Profile Report, 90% of the residents in Chino travel more than 15 miles one way to work, meaning the vast majority of the residents in the City travel outside the City for work. Additionally, the RTP/SCS TAZ demographic data concludes the number of persons that work in the City is currently 51,376. It is estimated that the number of persons that work in the City will increase to 53,796 by 2030. This is an increase of 2,420 persons working in the City over the next 10- years. It is unknown what percentage of these future jobs in the City would be considered low-wage jobs.

The average household size in the City is 3.5 persons per household. The RTP/SCS identifies the current population in the City is 91,623. The US Census estimates the current population of the City at approximately 94,371 or 20,536 households. The Census further states that approximately 79% of the population in the City is over the age of 18 and 52.3% of the population over the age of 18 is employed. This results in approximately 1.5 persons per household employed either in the City or elsewhere. With this estimated number of employed adults per household, a RHNA allocation of 6,961 units would result in approximately 10,439 additional employed persons in the City during the 6<sup>th</sup> Housing Element Cycle from 2021 to 2029. As mentioned above, only 2,420 jobs are estimated to be created between 2020 and 2030. Even if all the jobs created in the City were held by Chino residents, an additional 76% of the new residents, as a result of the RHNA allocation, would be required to find jobs outside of the City.

As of 2019, the average worker's annual salary in the City is \$46,623 (jobs EQ). By comparison, the average worker's annual salary in the state of California is \$69,241 and \$57,413 in the Nation. The median household income in the City is \$80,239 (Esri). The per Capita income in the City is \$26,679 (ESRI). The current minimum wage in Chino is \$13.00 an hour which is considered to be a low-wage job. Someone working fulltime at minimum wage would make \$27,040 a year. Approximately 13% of City residents make less than \$27,000 a year. With 90% of the residents of Chino traveling out of the City for work, it is likely that a significant number of low-wage workers travel outside the City for work. Adding an additional 3,388 low and very-low income units to the

City would likely exacerbate the imbalance between low-income workers in the City and available low-income housing resulting in issues that undermine and will not further the objective of RHNA as outlined in Government Code Section 65584(d)(3). Since the vast majority of residents travel outside the City for work, adding more low-income housing would result in low-income workers needing to travel outside the City for the work, increasing VMT on a regional scale, worsening impacts to transportation facilities, delays, and increased greenhouse gas emissions, in conflict with the State's climate goals.

**2. SCAG failed to adequately consider information related to Government Code Section 65584.04(e)(2)(A).**

The statutory factor that SCAG was required to include under Government Code Section 65584.04(e)(2)(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.*

The City has stated that the number of RHNA units allocated to the City through the methodology review process exceeds the capacity that the City and region can handle. This capacity includes the supply and distribution of water and sewer services. Specifically, as it relates to water and sewer services that are not under the control of the City.

The City is provided water by three entities, the City of Chino, the Monte Vista Water District, and the City of Chino Hills. The majority of the City (29.7 square miles) is provided water from the City, while approximately one square mile of the City is located within the Monte Vista Water District and approximately 0.1 square mile receives water from the City of Chino Hills. The City does not control the water supply and infrastructure for those areas under the control of the Monte Vista Water District or Chino Hills Water.

Additionally, a significant amount of the City's water infrastructure is located outside of the City, primarily in the City of Ontario. This includes wells, treatment facilities, and water storage. Some of these wells have better water quality than others. Some water wells may require significant treatment equipment in order for the water to be available for use. The City is in the process of preparing an update to its Urban Water Master Plan based on current estimated growth of the City, which does not consider the additional units provided in the Draft Allocation. The City does not control the ability to obtain the needed permits and approval through outside agencies for water infrastructure that is located outside of the City. At this time, without knowing the actual location of where the allocated units will be in the City it is difficult to plan appropriately. Much of the needed infrastructure, outside of the City's control, could take several years to fully implement and may go beyond the 6<sup>th</sup> Cycle Housing Element time period for construction of units.

The Inland Empire Utilities Agency (IEUA), is the regional wastewater facility that processes the wastewater for the City and six other agencies in the vicinity of the City. IEUA has two treatment facilities in the southern part of the City, known as RP-2 and RP-5. RP-2 is scheduled to be decommissioned and merged with RP-5 in the near future because it is currently located in a flood inundation area and determined to be unsafe for future use. IEUA's Fiscal Year 2020/2021 10-year forecast provides detailed information on current capacity, future demand, and proposed



expansion to accommodate for future demand for the next ten years, the period from 2020/21 to 2029/30. The demand analysis includes review of processing capacity for the future development of residential units, and commercial and industrial business in the region it serves. The IEUA 10-year capacity forecast has not factored in the number of Draft Allocated units allocated to the City, nor the units allocated to the other cities they serve. The 10-year capacity forecast currently forecasts a total of 2,881 units for the City. This is less than half of the proposed 6<sup>th</sup> Cycle RHNA allocation of 6,961 units. In discussions with IEUA representatives, they stated they are able to serve the City in the long-term as demand increases. However, this increased potential demand based on the RHNA allocation has not yet been fully analyzed and incorporated into any demand forecast. The ability for IEUA to expand its facility to manage the increased number of units is completely out of control of the City and it is unknown when the facilities will be fully constructed to meet the potential demand that would be required during the 6<sup>th</sup> RHNA Cycle. It is highly likely the timing of when the additional IEUA capacity would be available may exceed the timing of the 6<sup>th</sup> cycle.

Within the City, sewer infrastructure construction (sewer mains, sewer laterals, lift stations, etc.) have traditionally been the responsibility of the developer to install to serve their developments. This is typically managed on an individual project basis or through installation by a master developer who is reimbursed for this construction through the collection of Development Impact Fees (DIFs) and/or Special Assessment Bonds (CFDs). This includes upsizing of existing infrastructure to meet needed capacity. In the past, the City did not build sewer infrastructure to serve new development, only repairs and replacement through the City's Capital Improvement Program (CIP). The City is working on modifying this approach by taking on the installation of some new water and sewer infrastructure through Capital Improvement Project programs combined with installation completed by developers as noted above.

It is unknown at this time where the Draft Allocated units will be located throughout the City. Therefore, the needed infrastructure is unknown. In some parts of the City where there is less development, installing necessary infrastructure is less challenging. In other parts of the City, the upsizing of sewer lines or installation of new lines pose a greater, if not impossible, within the next eight-year 6<sup>th</sup> RHNA Cycle.

Due to the constraints outlined above, the availability and predictability of the development infrastructure results in issues that undermine and will not further the objective of RHNA as outlined in Government Code Section 65584(d)(2) because of the inability to promote infill development that will ensure the encouragement of efficient development patterns.

**3. SCAG failed to adequately consider information related to Government Code Section 65584.04(e)(2)(B).**

The statutory factor that SCAG was required to consider under Government Code Section 65584.04 (e)(2)(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.*

The City is 29.7 square miles in size. Of that area, several square miles are dedicated to other Federal, State, County or other jurisdiction uses. At the south end of the City, most of the residential development occurs within a large master plan. In this area, the Army Corp of Engineers and Orange County Flood Control District manage approximately seven square miles (4,500 acres) of land that is designated as a floodplain for the Prado Dam and undevelopable. The City also has two State prisons, California Institute for Men (CIM) and the California Institute for Women (CIW). The properties equal 4.25 square miles and are managed by the State with currently no possibility for this land to be designated as residential development to address the Proposed RHNA allocation. In addition, the County of San Bernardino manages the 1.71 square mile Chino Airport and prohibits the development of residential units on the airport property and within runway protection zones (RPZ) that are located near the airport. There are also several square miles of City and County owned park and open space land.

Additionally, the majority of the older part of the City is developed, so there are limited infill opportunities without removing existing residential, commercial, or industrial land uses. Some of the vacant land that is available for development has been included in two previous Housing Element cycles, which precludes them from being designated for development in this Housing Element cycle, unless developed at certain densities and specific standards related to affordability.

Furthermore, State Route 60, a multi-lane Freeway, runs through the north end of the City, and State Route 71, also a multi-lane Freeway, runs along the western edge of the City. Based on the 2005 Air Quality Handbook from the California Air Resources Board (CARB), developing homes within 500 feet of a freeway has been determined to be an extreme health risk to sensitive receptors, primarily children and the elderly, and should be avoided. CARB released the Technical Advisory, Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways in April 2017, which identifies that this distance may be able to be reduced, with certain design features added to residential projects. These include the construction of large sound walls, mature vegetation, and advanced filtration systems within the residential units. These design features would result in affordable housing developments to be cost prohibitive, further reducing the number of sites available for the development of low and very-low housing units.

Due to the constraints outlined above, the availability of developable land results in issues that undermine and will not further the objective of RHNA as outlined in Government Code Section 65584(d)(2) because of the inability to promote infill development that will ensure the encouragement of efficient development patterns.

**4. SCAG failed to adequately consider information related to Government Code Section 65584.04(e)(2)(C).**

The statutory factor that SCAG was required to consider under Government Code Section 65584.04 (e)(2)(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.*

As mentioned, the Army Corp of Engineers and Orange County Flood Control District own approximately 7-square miles of floodplain property located adjacent to the Prado Dam. These lands are protected from development due to being within a floodplain, but also having a dual function as wildlife and environmental habitats. Additionally, there are several Natural Treatment Systems (NTS) that include basins in the south end of the City that have been constructed to protect wildlife habitats and wetlands. Due to this, these areas are unable to be developed.

Furthermore, there is land in the southern portion of the City that is set aside as natural open space and designated as farmland. Due to this designation, the ability to develop this land is hindered in addition to this land being located within a floodplain where homes could not be developed.

Due to the constraints outlined above, the availability of developable land being in a floodplain, or under control by the State, County or Federal Government, or to be utilized for NTS purposes results in issues that undermine and will not further the objective of RHNA as outlined in Government Code Section 65584 (d)(2) because of the inability to promote infill development that will ensure the encouragement of efficient development patterns.

**5. SCAG failed to adequately consider information related to Government Code Section 65584.04(e)(3).**

The statutory factor that SCAG was required to consider under Government Code Section 65584.04(e)(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 noted in the introduction, in 2018, the City had worked with SCAG to provide input on the 2020 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). That input included the number of households that are forecasted to be developed in the City between 2020 and 2045. The number of households identified for 2020 is 24,526 and 27,963 in 2030; this is a difference of 3,437 households in a ten-year time frame. The draft allocation of 6,961 units, in an eight-year cycle, is more than double the number of units forecasted for the 2020 RTP/SCS.

The RTP/SCS does not take into consideration the number of households allocated to the City in the Draft Allocation. The more than doubling of the units to be developed will have an impact on the Regional Transportation Plan as it relates to needed infrastructure, not only in the City, but in the entire SBCTA region. The increase of 3,437 households has an associated increase of 25,000 to 35,000 additional trips a day (source: ITE Trip Gen 10<sup>th</sup> Edition (multi-family and single-family daily rate)) not currently considered in the RTP/SCS.

The City utilizes Omnitrans to provide bus service to residents within the City. The City has no rail or other mass transit serving the community. According to the Omnitrans Short-Range Transit Plan, only 1.5% of the population uses public transit, which is the lowest in the region served by

Omnitrans. SCAG's 2019 Local Profiles Report identifies that only 11.7% of Chino residents live and work in the City, while 88.3% travel outside the City for work. The average travel time to work one way is 34 minutes, and 75.5% of the households own two or more vehicles. This low number of residents using public transit and the large number of residents that travel outside the City results in a significant increase in vehicles miles traveled.

SCAG has identified that portions of Chino are in a High-Quality Transit Area (HQTA). An HQTA is defined as a walkable village or corridor that is within one-half mile of a major transit stop or a High-Quality Transit Corridor. An HQTC is defined as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. A major transit stop is defined as a site containing existing real or bus rapid transit station or the intersection of two or more bus routes with a frequency of service interval of 15 minutes.

Omnitrans operates four bus routes in the City (83, 84, 85, and 88) with additional on-demand services mostly for Seniors. None of the four routes operated by Omnitrans have service intervals that are 15 minutes or less. The majority of the routes have an average service interval of one-hour. All four routes do provide service to and from the Chino Transit Center, but this transit center is not considered a rapid transit center since none of the routes have an interval of 15 minutes or less. Based upon this information, there are no HQTC's, or major transit stops in Chino. Therefore, no part of Chino could currently be considered an HQTA. Based on Omnitrans' Service Plan 2020-2021, there are no plans to expand service in Chino or reduce service interval times.

The RTP/SCS has not properly planned for this doubling of the number of households that will put a strain on the local and regional transportation infrastructure.

As noted above, the majority of the residents work outside of the City and a very small percentage (1.5%) of the residents utilize public transportation. Additionally, there are no portions of the City that could be classified as an HQTA. This results in issues that undermine and will not further the objective of RHNA as outlined in Government Code Section 65584(d)(2) because of the inability to promote infill development that will ensure the encouragement of efficient development patterns due to impacts to the transportation system and lack of high-quality public transportation.

**6. SCAG failed to adequately consider information related to Government Code Section 65584.04(e)(12).**

*The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080.*

The greenhouse gas emissions outlined in the RTP/SCS identify that the current growth model, as noted above, will result in an increase of over 190 MT of CO<sub>2</sub>e. The additional RHNA allocated units not studied in the RTP/SCS will likely result in an increase of almost 390 MT of CO<sub>2</sub>e over the same time frame, which is more than double that amount of greenhouse gas (GHG) from automobile emissions and other sources. This is due to that fact that, as mentioned above, only 1.5% of the City's population uses public transportation and the majority of residents work outside the City and travel an average of 34 minutes to and from work.

This more than doubling of GHG undermines and will not further the objective of RHNA as outlined in Government Code Section 65584(d)(2) because of the inability to likely achieve the region's GHG targets provided by the State Air Resources Board pursuant to Section 65080.

**Methodology related to the Statutory Objectives as outlined in Government Code Section 65584(d)**

**7. SCAG failed to adequately consider Local factors information related to the Statutory Objectives in Government Code Section 65584(d).**

*(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.*

There is currently limited ability to develop affordable housing at the allocated number of units due to lack of funding for affordable housing as well as the loss of redevelopment funding and other sources. There is a lack of available land (over 100 acres would be needed) to accommodate the allocated number of affordable units based on the default densities and overall number of required units. The lack of funding in and of itself is part of the problem. The requirement for the City to comply with the no-net loss law (SB 166) could result in land not being developed for either low-income housing or housing at higher densities due to the lack of replacement land if market-rate housing is desired on specific parcels of land. This could result in land remaining undeveloped for any type of housing. Furthermore, the areas with available land could result in the affordable units being concentrated in one area of the City and not disbursed in an equitable manner throughout the City.

*(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.*

Adding units in areas where jobs are unavailable will result in increased VMT and an increase in GHG, due to a lack of significant public transit opportunities. Additionally, as noted above, a majority of the City's residents travel outside of the City for work, further increasing VMT and GHG. Many areas of the City are currently built out. Additional infill development would have negative impacts on efficient development patterns.

*(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.*

As noted in Item No. 1 above, it is unknown how many low wage jobs are available in the City. The majority of the residents of Chino travel outside the City for work. This would only be exacerbated by an increase in affordable housing. An increase in low-wage jobs would be required to support the development of affordable housing in the City if the objective is to provide affordable housing for low wage workers.

**8. SCAG failed to determine the City's share of regional housing need, as described in the Final RHNA Methodology, as it relates to Existing Need and determining populations located within an HQTAs.**

As noted in Item No. 5 above, the City currently has no HQTAs or a major transit stop. Therefore, there are currently no HQTAs in the City nor does Omnitrans intend to expand services in the

near future that would result in areas of the City being considered an HQTAs. In fact, Omnitrans is *reducing* services in the City of Chino, due to low ridership and economic issues related to the COVID-19 pandemic. SCAG has identified that the City has an existing need of 1,502 units near transit due to being within an HQTAs. Based on this, since there are currently no HQTAs in the City, the existing need related to HQTAs does not actually exist, and those 1,502 units should not be included in the RHNA allocation.

### Change in Circumstance

In addition to the eight factors above, the current pandemic has resulted in a potentially significant unknown change in circumstances to the development of housing throughout California. It is unknown how people will want to live, work and shop in the communities they live in. Creating more housing, likely at higher densities for affordable housing, could be challenging due to needs for social distancing and concerns of the spread of disease. Additionally, the nature of work and types of jobs available are experiencing dramatic shifts as well, which will also have unforeseen, long-ranging impacts on transportation infrastructure in the region.

### C. CONCLUSION

For the reasons outlined in this letter, the City of Chino respectfully requests that the Regional Housing Needs Assessment (RHNA) Appeals Board reduce the number of units allocated to the City from 6,961 units to 3,397 units to be in line with the estimated households projected in the RTP/SCS from 2020-2030. This reduction would include the removal of the 1,502 units allocated for existing need in areas that had been determined to have an HQTAs, where no HQTAs currently exists in the City. The City requests that the Board consider the unique circumstances and challenges outlined above.

While the City is aware that all cities in California need to make sacrifices to fully address the housing demand problem, we do not believe that a 2,400% RHNA increase from the previous Housing Element cycle is reasonable or could be properly implemented in the City. We appreciate the opportunity to submit this appeal and look forward to a response.

Sincerely,



Eunice Ulloa  
Mayor

cc: Chino City Council Members  
Matthew Ballantyne, City Manager  
Fred Galante, City Attorney  
Nicholas Liguori, Director of Development Services

Attachments:

- Letter dated September 13, 2019
- Letter dated November 6, 2019

EUNICE M. ULLOA  
Mayor

TOM HAUGHEY  
Mayor Pro Tem



MARK HARGROVE  
MARC LUCIO  
PAUL A. RODRIGUEZ Ed.D.  
Council Members

MATTHEW C. BALLANTYNE  
City Manager

## CITY of CHINO

September 13, 2019

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

RE: Proposed Regional Housing Needs Assessment (RHNA) Allocation Methodology

Dear Mr. Ajise:

The City of Chino appreciates the opportunity to provide written comments to the Southern California Association of Governments (SCAG) regarding the proposed Regional Housing Needs Assessment (RHNA) allocation methodology. While the City of Chino is committed to implementation of a local plan to accommodate housing needs for residents at all income levels, the Department of Housing and Community Development's (HCD's) calculation of the future need for affordable housing based on the three methodology options presented does not seem to be realistic.

HCD's allocation of over 1,344,000 housing units to the SCAG region for the 6<sup>th</sup> cycle, of which 5,045 to 13,104 could be allocated to Chino (depending on which methodology option SCAG selects), requiring 3,260 to 8,469 affordable housing units to be delivered, is neither reasonable nor attainable. During the current eight-year RHNA 5<sup>th</sup> cycle, Chino experienced significant growth and facilitated the construction of over 2,940 homes, of which 340 are affordable. HCD's proposed allocation would require Chino to build 1.1 to 2.88 times as many affordable homes in the 6<sup>th</sup> cycle as the total number of homes constructed in all income categories to date in the City within the current cycle. The City believes HCD's affordable housing numbers are unrealistic given the region's capacity and previous history of development. SCAG should continue to work with HCD to develop a reasonable, realistic allocation target.

While the City of Chino does not believe the proposed RHNA allocation for the SCAG region is obtainable and is advocating that SCAG negotiate with HCD to reduce the allocation to a more achievable number, we understand the need for input on the allocation methodology. Option 2 would appear to be the most preferred for the City, as units are simply assigned based on the City's population share and consideration of High-Quality Transit Areas (HQTAs). The two other options introduce factors that do not relate to the City, based on the City's size and location in the region. It should be noted that it is also important to factor in job centers in relation to housing when working with HCD to develop the final RHNA allocations numbers. Without this important analysis, it will contradict the State's goal of reducing Vehicle Miles Traveled and greenhouse gas emissions.

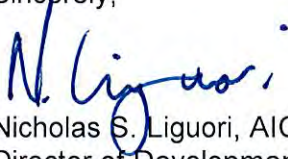
The City of Chino appreciates your considerations of the comments provided. It should be noted, the City shares SCAG's goal to develop and adopt a RHNA methodology that represents the best



Mr. Kome Ajise  
September 13, 2019  
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regional planning that is developed collaboratively with local jurisdictions and stakeholders in a manner that is credible and achievable, and can be realistically implemented.

Sincerely,



Nicholas S. Liguori, AICP  
Director of Development Services

cc. Development Services Department File



EUNICE M. ULLOA  
Mayor

TOM HAUGHEY  
Mayor Pro Tem



MARK HARGROVE  
MARC LUCIO  
PAUL A. RODRIGUEZ Ed.D.  
Council Members

MATTHEW C. BALLANTYNE  
City Manager

## CITY of CHINO

November 6, 2019

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

RE: Proposed Regional Housing Needs Assessment (RHNA) Allocation Methodology

Dear Mr. Ajise:

The City of Chino appreciates the opportunity to provide written comments to the Southern California Association of Governments (SCAG) Regional Council regarding the proposed Regional Housing Needs Assessment (RHNA) allocation methodology. While the City of Chino is committed to implementation of a local plan to accommodate housing needs for residents at all income levels, the Department of Housing and Community Development's (HCD's) calculation of the future need for affordable housing based on the draft methodology recommended by the SCAG RHNA Subcommittee and the Community, Economic, and Human Development (CEHD) Committee as presented does not seem to be realistic.

HCD's allocation of over 1,341,000 housing units to the SCAG region for the 6<sup>th</sup> cycle, of which 8,361 are allocated to Chino, based on the latest methodology, requiring that 4,105 affordable housing units to be delivered, is neither reasonable nor attainable. During the current eight-year RHNA 5<sup>th</sup> cycle, Chino experienced significant growth and facilitated the construction of over 2,940 homes, of which 340 are affordable. HCD's proposed allocation would require Chino to build 1.40 times as many affordable homes in the 6<sup>th</sup> cycle as the total number of homes constructed in all income categories to date in the City within the current cycle. The City believes HCD's affordable housing numbers and SCAG's current proposed affordable housing allocation for the City of Chino are unrealistic given the region's capacity and previous history of development. SCAG should continue to work with HCD to develop a reasonable, realistic allocation target.

While the City of Chino does not believe the proposed RHNA allocation for the SCAG region is obtainable, with no other option choices available, the previously proposed Option 2 would appear to be the most preferred as units are simply assigned based on the City's population share and consideration of High Quality Transit Areas (HQTA). The current proposed methodology relies too heavily on the local input process associated with the SCAG's 2020 RTP/SCS, which distributes units to Chino based on projected growth using horizon year 2045 and not the shorter 2029 RHNA horizon year timing. It should be noted that it is also important to factor in job centers, infrastructure, and availability of transit in relation to housing when working with HCD to develop the final RHNA allocations numbers. Without this important analysis, it will contradict the State's goal of VMT/GHG reduction.

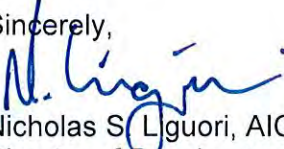


November 4, 2019

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The City of Chino appreciates your considerations of the comments provided. It should be noted, the City shares SCAG's goal to develop and adopt a RHNA methodology that represents the best regional planning that is developed collaboratively with local jurisdictions and stakeholders in a manner that is credible and achievable, and can be realistically implemented.

Sincerely,



Nicholas S. Liguori, AICP  
Director of Development Services

- cc. Development Services Department File
- Joann Lombardo-City of Chino Hills, Director of Community Development
- Ray Marquez-City of Chino Hills, Council Member



# OmniCONNECTS

Connecting People, Business and Community  
FY2015-2020 Short-Range Transit Plan



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## MESSAGE FROM OMNITRANS' CEO/GENERAL MANAGER

I am excited to present Omnitrans' business plan for the next six years -- the OmniConnects Short Range Transit Plan for fiscal years 2015-2020. This plan embodies Omnitrans' mission of connecting communities, and it outlines our plan for providing high-quality, effective and fiscally responsible public transportation services for the communities of the San Bernardino Valley.

Omnitrans always welcomes suggestions from our passengers, partners, or anyone who has an interest in what we do. During the formation of this plan, we spoke with hundreds of passengers and members of the public, as well as representatives of our member cities and partner agencies, all of whom provided us valuable feedback on the changes and policies presented in the OmniConnects plan. The OmniConnects plan codifies Omnitrans' direction through 2020 as established by our Board of Directors. That being said, it will be a living document, which will be refined in our annual Service Element. The policies set forth in the plan will not preclude innovation but will provide a blueprint and a strategy for Omnitrans to continually become a better agency.

In the OmniConnects plan, Omnitrans strives to do more with less. In the face of a constrained financial reality, the plan lays out a balanced budget for the agency over the next six years. The OmniConnects plan coupled with previous agency actions resolved a projected \$12.8 million budget shortfall without making overall cuts to service.

In order to continue providing the same level of service to our passengers, it became apparent in the preparation of this plan that a difficult decision would have to be made to propose three fare increases during fiscal years 2015-2020. Historically, Omnitrans has raised fares every two years; but due to the recent economic climate we have not raised fares in five years, since 2009. The OmniConnects plan proposes returning to the historic pattern of raising fares every two years.



**P. Scott Graham,  
Omnitrans' CEO and General  
Manager**

The OmniConnects plan reaffirms and strengthens our Board of Directors' goals for improving the service we provide to our communities. The plan reaffirms Omnitrans' goal of putting 65% of our resources toward the provision of "productivity-oriented services," primarily straight, fast, direct, frequent routes with high rates of ridership and a bus at least every 20 minutes. The other 35% of our resources will go toward providing lifeline services to ensure Omnitrans meets its goal that 85% of homes or jobs in our service area will have a bus stop within ¼ mile. By focusing more than half of our resources on highly productive service, we will be providing faster, better service for everyone in the Valley.

While the 65/35 goal was set forth in 2001, the OmniConnects plan now redefines it as necessitating the restructuring and adjusting of existing routes to move gradually from the current 50/50 split to a 65/35 split in the future. The OmniConnects plan outlines a variety of proposals to make our routes more direct in order to serve passengers better.

The OmniConnects plan outlines a better system for measuring Omnitrans' progress toward meeting the goals outlined in the plan, such as on-time performance and passengers per hour. It uses a stop light system with red, yellow, and green ranges of acceptability to provide guidance on when routes need to be adjusted or changed to perform better. A central idea behind the proposals in OmniConnects is to reward high-performing routes with more frequency in order to provide the highest level of service where the most passengers are riding. The Omnitrans Board of Directors will be regularly informed of how all routes are performing so they can help to guide future decisions.

Within the OmniConnects plan, several new projects are proposed that will provide much faster, more direct service in the future. These are currently unfunded projects; adoption of this plan will give us approval to go forward with seeking grant funding and planning to make them a reality. This includes the three major proposals, listed below. Omnitrans also proposes to add frequency and/or more operating hours to our high-performing routes if additional operating funding comes available.

- ▶ The West Valley Connector Corridor – a bus rapid transit line through Fontana, Rancho Cucamonga, Ontario, Montclair, and Pomona. The route will reduce end-to-end travel times by 10% by reducing the number of stops to space them ½-mile to one mile apart, as well as using transit signal priority to bypass traffic congestion. The project will also include significant improvements to bus stops/stations. A future phase will include 3.5 miles of dedicated transit lanes on Holt Boulevard in the City of Ontario, as well as 60' articulated transit vehicles to operate the route.

## Omnitrans' Mission

To provide the San Bernardino Valley with comprehensive public mass transportation services which maximize customer use, comfort, safety, and satisfaction, while efficiently using financial and other resources, in an environmentally sensitive manner.

- ▶ The Foothill Central Corridor – a limited-stop route along Foothill Boulevard/Fifth Street through San Bernardino, Rialto, and Fontana. The route will stop approximately every one mile. In future phases, capital improvements such as transit signal priority and stop/station improvements will be implemented as funding becomes available.
- ▶ A network of freeway express services, which will use HOV lanes on freeways where available to provide express peak commuter service between major downtown areas/employment centers or park-and-rides.

The OmniConnects plan also contains an exciting step forward for our agency in that we will be signing on to the American Public Transportation Association’s Sustainability Commitment. This is a reaffirmation of our agency’s commitment to reducing our footprint and using resources more efficiently. Omnitrans has engaged in many initiatives in the past decade to reduce our vehicle emissions, reduce our water usage, paper usage, electricity usage, and waste, and much more. The signing of the Sustainability Commitment signifies that we will continue to generate as many creative and cost-saving ideas as we can to continue these efforts in the future.

I look forward to seeing how Omnitrans can serve our riders better over the coming years. With our recently opened sbX Green Line in San Bernardino and Loma Linda, along with the proposals outlined in the OmniConnects plan for future sbX bus rapid transit lines as well as freeway express services, we will greatly improve the speed of travel on public transportation, making it a more competitive mode of transportation for everyone in our communities. This is a necessary part of the regional solution, in cooperation with our partner agencies, to improve air quality and overall quality of life in our region.

I extend a huge thank you to our Board of Directors, as well as Omnitrans staff, passengers, partners, and supporters for assisting us as we chart the path forward toward Omnitrans’ future.

Yours truly,



P. Scott Graham  
CEO/General Manager

## Omnitrans:

- ▶ Provides 16 million passenger trips annually and over 50,000 trips per weekday.
- ▶ Serves 1.5 million residents in 15 cities in the San Bernardino Valley.
- ▶ Just launched the sbX Green Line, a \$192 million Bus Rapid Transit project that is bringing faster and more frequent bus service to the San Bernardino Valley.
- ▶ Has partnered with the San Bernardino Associated Governments (SANBAG) to deliver in 2015 the state-of-the-art multi-modal San Bernardino Transit Center that will connect over 6,000 riders per day with high-quality bus and Metrolink commuter rail service.

## OMNITRANS BOARD OF DIRECTORS



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- [Ontario](#) -



Vice Chair:  
**Sam Spagnolo**  
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## 1 EXECUTIVE SUMMARY

OmniConnects is Omnitrans' FY2015-2020 Short Range Transit Plan (SRTP), which is Omnitrans' business plan to connect people, businesses and our community with safe, reliable and convenient public transportation in a financially and environmentally sustainable manner.

### 1.1 Introduction

- ▶ Omnitrans is a Joint Powers Authority (JPA) formed to provide public transportation in the San Bernardino Valley including the County of San Bernardino and 15 member cities: Chino, Chino Hills, Colton, Fontana, Grand Terrace, Highland, Loma Linda, Montclair, Ontario, Rancho Cucamonga, Redlands, Rialto, San Bernardino, Upland and Yucaipa.
- ▶ Omnitrans' mission is: To provide the San Bernardino Valley with comprehensive public mass transportation services which maximize customer use, comfort, safety, and satisfaction, while efficiently using financial and other resources in an environmentally sensitive manner.
- ▶ Omnitrans' key goals in OmniConnects are:
  - Deliver safe, reliable, clean, frequent, convenient, comfortable and equitable service.
  - Enhance Omnitrans' network design to increase ridership and minimize costs by reducing redundancy.
  - Minimize impact to existing riders while seeking opportunities to expand ridership.

- Support the local economy by providing connections to where people want to go.
- Maximize cost recovery while charging a fair fare.
- Support initiatives that are financially and environmentally sustainable in the short and long term.
- Expand, maintain and improve existing vehicles, facilities and passenger amenities.
- ▶ Several strategies to focus on these goals were developed in the areas of Core Mission, Cost Efficiency, Connections, and Partnerships.
- ▶ Since the last SRTP was completed Omnitrans has had many accomplishments including the delivery of the sbX Green Line on time and on budget; new transit centers in Rancho Cucamonga at Chaffey College, Yucaipa and Ontario; the Go Smart student pass program; Rebranding; introduction of NexTrip real-time bus arrival information; and, the introduction of OmniGo Community Circulators, all while maintaining fare stability for Omnitrans' riders.

### 1.2 Our Community

- ▶ As of 2014, Omnitrans' service area is 456 square miles with a population of 1.48 million residents, with 74% of the population defined as a minority.
- ▶ The cities of San Bernardino and Ontario have higher population urban centers, while communities like Yucaipa are more rural and less densely populated.

- ▶ Ontario and Chino are projected to see fast population growth during the next 10-20 years.
- ▶ Population density in the cities ranges from 1,700 people per square mile in Chino Hills to 7,333 people per square mile in Montclair.
- ▶ Ontario and Loma Linda have the highest concentration of jobs compared to population which is indicative of the need for greater inflow transit options in the morning and outflow options in the afternoon/evening.
- ▶ Higher numbers of younger people tend to cluster centrally in the service area, especially in cities and communities lying between the I-10 and I-210 freeways. Older populations tend to locate more often to the north of the I-210 freeway or south of the I-10 freeway or at the periphery of Omnitrans' service area.

### 1.3 Our Riders

- ▶ In FY2013, Omnitrans delivered 16.1 million passenger trips, which has grown 9% over the last five years.
- ▶ Omnitrans' average weekday boardings were just over 54,000 during FY2013.
- ▶ Omnitrans' ridership varies in age, ethnicity and gender. Omnitrans' most typical rider is a female between the ages of 19-29 years old who rides transit to work or to school.

- ▶ More than half of Omnitrans riders are 39 years old or younger. The largest individual age cohort of riders is between the ages of 20-29 years old (26%). The smallest share of riders is 60 years old or older at 9%.
- ▶ More than half of the riders indicate that they have at least one auto in their household.
- ▶ Nearly two-thirds of riders live in a household that earns less than \$35,000 annually. Most riders (61%) reported earning less than \$20,000 per household. In contrast, over half of non-riders surveyed reported household income levels of at least \$50,000 per year.
- ▶ Riders continue to express the need for increased regional connectivity, which can be seen by the growth of Omnitrans' freeway express route, Route 215, which connects Downtown San Bernardino to Riverside via Interstate 215. 64% of riders surveyed expressed an interest in additional express routes.
- ▶ Between FY2007 and FY2013 ridership system-wide grew by 4.3%. During the same period, senior ridership grew more than six times faster at 26.7%.
- ▶ Student ridership has increased approximately 19% each year from FY2007 through FY 2013.

## 1.4 Our Services

- ▶ Omnitrans offers a family of services designed to match the service with the land use, ridership activity and needs of

the community. These include: sbX Bus Rapid Transit; Omnitrans Local; Omnitrans Express; OmniGo Community Circulators; Access ADA Paratransit and OmniLink General-Public Dial-a-ride.

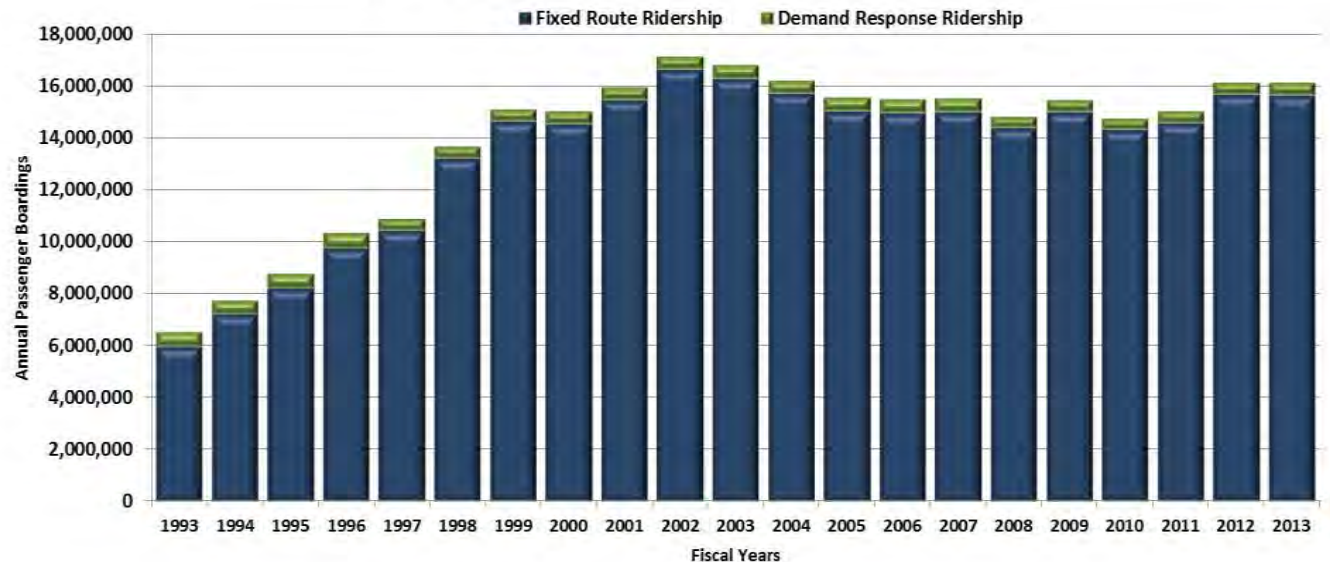
- ▶ In FY2013, Local bus service delivered 93.9% of Omnitrans' ridership, 72.3% of Omnitrans' revenue hours of service and 77.4% of operating costs; Express Bus service delivered 2.2% of ridership, 1.4% of revenue hours and 1.8% of costs; OmniGo delivers 0.9% of ridership, 3.5% of revenue hours and 2.7% of costs; Access delivers 2.9% of ridership, 22.0% of revenue hours and 17.5% of costs and OmniLink provides 0.1% of ridership, 0.8% of revenue hours and 0.6% of costs.
- ▶ The sbX Program is the first-of-its-kind Bus

Rapid Transit (BRT) service to be constructed in the Inland Empire. It includes frequent 10-minute peak service, limited stops, traffic signal prioritization, dedicated transit stations, dedicated right-of-way, branded vehicles and dedicated corridor capital improvements.

- ▶ Omnitrans currently operates 32 fixed routes with service frequency ranging from every 15 minutes to every 70 minutes. Most of Omnitrans' routes operate seven-days per week and Omnitrans weekday system hours of service operation are from 3:48 A.M. to 11:13 P.M.
- ▶ Omnitrans overall ridership can be seen in **Error! Not a valid bookmark self-reference..** Detailed route performance statistics can be found in the Comprehensive Operational

Exhibit 1: Omnitrans Systemwide Ridership FY1993-2013

### Omnitrans' System-wide Ridership by Mode



Analysis of Omnitrans. Key route level statistics can be seen in Chapter 5.

## 1.5 Our Partners

- ▶ Omnitrans services are delivered in cooperation with many partners including neighboring transit agencies, funding partners, planning partners and member cities.
- ▶ Omnitrans services offer direct connections to Riverside Transit Authority, Foothill Transit, Orange County Transportation Authority, Victor Valley Transit Authority, Mountain Transit, Pass Transit, Metrolink, Greyhound and Amtrak.
- ▶ Omnitrans funding and planning activity relies on many successful partnerships. Omnitrans' key partners include the Federal Transit Administration (FTA), California Transportation Commission, CalTrans, Southern California Association of Governments (SCAG), San Bernardino County, San Bernardino Associated Governments (SANBAG), Omnitrans' JPA-member cities, and VTrans.

## 1.6 Financial Plan

- ▶ Omnitrans' FY2015-2020 financial plan is based on the revenue and cost projections developed to close out the Comprehensive Operational Analysis (COA) of Omnitrans.
- ▶ In December 2013, the Omnitrans Board of Directors received a seven-year funding plan (Fiscal Year 2014

– Fiscal Year 2020) that originally showed an operating deficit of \$12.81 million.

- ▶ Since the conclusion of the COA, Omnitrans has worked to resolve the projected budget shortfall. Omnitrans is proud to present this OmniConnects plan which is a fiscally balanced and financially sustainable plan that closes the previously projected \$12.81 million shortfall while maintaining the overall level of service that Omnitrans provides.
- ▶ Closing of the shortfall revolved around three key items: 1) Organizational Restructuring; 2) Proposed Fare Changes; and 3) Risk Management.
- ▶ **Organizational Restructuring** – Omnitrans restructured its senior management team by combining four departments into two. This provided Omnitrans the opportunity to reduce operating costs and gain operational efficiencies by reducing headcount.
- ▶ **Proposed Fare Changes** – The original financial plan contained fare increases in FY2015 and FY2018. The Fare policy was revised to implement the fare increases in FY2015,

FY2017 and FY2019. These provided Omnitrans the ability to generate an additional \$3.31 million in fare revenue.

- ▶ **Risk Management** – A major component of Omnitrans' operating cost is the reserves for outstanding workers compensation and liability claims. The reserves to settle outstanding claims are maintained at high confidence levels. After review of historical data, risk assessment, and industry standard, it was determined that Omnitrans can operate with lower reserves while aggressively pursuing cost containment.
- ▶ Detailed operating revenue and costs projected by funding category can be found in the Financial Plan chapter. A summary table with total projected operating revenue and projected operating costs is shown in Exhibit 2.
- ▶ Omnitrans' capital plan was balanced at the completion of the COA and remains so in OmniConnects. The Capital Plan includes funding for revenue vehicles, support vehicles IT projects, facilities and transit enhancements. The revenue vehicle

Exhibit 2: Omnitrans Operating Revenues and Operating Cost Forecast (Millions)

SOURCE	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	TOTAL
Total Operating Revenue	\$71.56	\$75.47	\$77.31	\$79.59	\$81.56	\$84.01	\$86.09	\$555.59
Total Operating Cost	\$71.56	\$75.47	\$77.31	\$79.59	\$81.56	\$84.01	\$86.09	\$555.59
Surplus (Shortfall)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

replacement cycle is established as fifteen 40-foot coaches and fifteen demand response/OmniGo vehicles per year through the completion of the plan.

## 1.7 Standards & Performance Measures

- ▶ The OmniConnects plan defines four main types of performance measures, standard or metrics:
  - **Service Warrants** describe and set Omnitrans' principles, conditions and expectations when considering new service.
  - **Service Standards** describe and set Omnitrans' routing principles, frequency requirements, span of service, walking standards and similar measures.
  - **Service KPIs** track the performance of specific routes and modes to determine which specific service offerings are most productive, most effective, and most efficient. The measures are tracked and analyzed with the highest frequency at the greatest level of granularity.
  - **Business KPIs** track the performance of broader levels of Omnitrans performance that is not specifically tied to a route. These include measures associated with safety, staffing efficiency, attendance, maintenance, and costs.
- ▶ For key measures, specifically within Service KPIs, OmniConnects standards are based on a

stop-light approach that provide green (exceptional), yellow (acceptable) and red (unacceptable) targets. This allows for a better tool to manage multiple offsetting goals rather than using simple pass/fail goals.

- ▶ The OmniConnects plan reiterates the direction set by Omnitrans' Board of Directors in 2001 to allocate 65% of resources to productivity-oriented service and 35% of resources to coverage-oriented services.
- ▶ Following lengthy discussions with the Plans and Programs Committee, the OmniConnects plan proposes to modify this 65/35 productivity/coverage goal by: 1) Seeking to reach this goal by shifting current resources and services rather than waiting for funding to add additional services; and 2) firmly defining productivity-oriented service as frequent local service (20 minutes or better); BRT; limited stop; freeway express; and/or a local route underlay of one of the previous service types.
- ▶ The monitoring program defined in OmniConnects is based on both historic trend data and peer data. For peer data, Omnitrans is a member of the American Bus Benchmarking Group, which is currently a collaboration of 17 mid-sized agencies that share data annually on several hundred data points.
- ▶ The OmniConnects plan's monitoring program proposes regular reporting of system and route level measures to the Plans and Programs Committee.

## 1.8 Sustainability

- ▶ Sustainability is balancing the economic, social and environmental needs of a community. It is also adopting policies and programs that make good business and environmental sense.
- ▶ Omnitrans follows and is involved in implementation plans associated with California Senate Bill 375, SCAG's Sustainable Community Strategy, and the San Bernardino County Active Transportation Network.
- ▶ Omnitrans is a national leader in sustainability among the public transportation industry, having been among the first agencies in the country to implement clean natural gas vehicles, along with a host of other initiatives.
- ▶ The OmniConnects plan proposes that Omnitrans become a signatory of the American Public Transportation Association's (APTA's) Sustainability Commitment.
- ▶ Signatory agencies must commit to the following: Make sustainability part of the agency's strategic objectives; Identify a sustainability champion within the agency who tracks key sustainability indicators and targets; Establish an outreach program on sustainability for staff; and, Establish a baseline measurement for key indicators.

## 1.9 Unconstrained Service Plan

- ▶ The unconstrained plan provides the broad vision of what Omnitrans wants overall service to look like.

- ▶ An unconstrained plan is a service plan for which there are not currently enough available financial, capital and/or operating resources to provide the full complement of services described. It is used to develop services that Omnitrans believes would meet service delivery standards if the service were to be offered. Within the context of OmniConnects, the unconstrained plan will be used primarily as a mechanism to develop the constrained plan and then to seek additional grant funding when opportunities arise.
- ▶ Key elements of the unconstrained service plan are to streamline routes in order to improve travel directness, travel times, ease of understanding, reduce redundancy and build upon Omnitrans key high-frequency routes such as sbX and local Routes 14, 66 and 61.
- ▶ The plan provides detailed route by route map, frequency and service hour recommendations.
- ▶ Proposed East Valley changes focus on extending the travel time benefits of sbX by developing stronger east-west connections to sbX that connect into Yucaipa, Redlands, Highland, Loma Linda, Colton, Rialto and Fontana.
- ▶ To this end the plan proposes consolidating three partially duplicative routes of Route 8, 9 and 19, into two higher frequency versions of Routes 8 and 9. This creates better sbX connections along Redlands Boulevard and Barton Avenue.
- ▶ Frequency in proposed to be improved on Routes 3 and 4 due to high ridership which connects to sbX along Highland Avenue.
- ▶ In order to add these improvements, low ridership routes like Route 20 are proposed to see a reduction in service frequency.
- ▶ In West Valley, the unconstrained plan focuses on improving the directness of north-south travel to feed into two of Omnitrans highest ridership routes (Routes 61 & 66) that travel primarily on Foothill Boulevard and Holt Boulevard.
- ▶ To this end, routes are straight-lined to improve the directness of travel on Haven Avenue, Milliken Avenue, Mountain Avenue and Euclid Avenue.
- ▶ Ridership and frequency are matched by proposing to move higher frequency service (30 minutes) to Central Avenue and from Ramona Avenue on Routes 65 and 68.
- ▶ Low ridership areas and areas with duplicative service offerings are proposed to be consolidated or eliminated. Travel from Holt Boulevard to Montclair Transit Center is consolidated from three routes to two.
- ▶ Service on Omnitrans lowest performing local route (Route 67 along Baseline Avenue between Fontana, Upland and Montclair) is redirected to establish a one-seat ride between Fontana and Chaffey College.
- ▶ Omnitrans proposes continuing working on two future BRT corridors.
- ▶ One corridor is the West Valley Connector as a multi-phase BRT, BRT-light or rapid corridor. The West Valley Connector is a corridor that connects Fontana, Rancho Cucamonga, Ontario, Montclair and Pomona on a combination of Sierra Avenue, Foothill Boulevard, Milliken Avenue and Holt Boulevard.
- ▶ A second corridor is the Foothill Corridor which connects from Highland to Montclair. The central portion of the Foothill Corridor which corresponds to Omnitrans Route 14, is proposed to be the first segment of the Foothill Corridor improved.
- ▶ Omnitrans proposes seeking funding option to develop a series of freeway express routes designed to greatly expedite east-west travel throughout the San Bernardino Valley.
- ▶ Omnitrans identifies the overlap between OmniLink and OmniGo service as a potential area to eliminate redundancies in order to work to fund key service enhancements.

## 1.10 Constrained Service Plan

- ▶ The OmniConnects Constrained Plan is the proposed implementation plan derived based on the forecasted revenue presented in the Financial Plan and the desired service detailed in the Unconstrained Plan. The Constrained Plan proposals are designed to be implemented with the adoption of each annual service element.
- ▶ Key elements of the constrained plan are proposed service changes, estimated service

levels, estimated performance, and planned questions that should be answered when developing the implementation plan each year.

► When developing ridership and revenue forecasts, Omnitrans takes a highly conservative approach. The forecast drivers for ridership are: three proposed fare increases; conservative organic growth typically at one-percent per year; conservatively assuming sbX ridership remains at opening year levels; and Access ridership growth consistent with recent trends.

► **FY2015 Service Proposals:**

- A 16% fare increase that brings the base fare from \$1.50 to \$1.75 and increases other fares by a similar percentage.
- East valley proposed service changes designed to build strong east-west local routes that connect into sbX; this includes changes to Routes 3, 4, 5, 8, 9 and 19. The largest of these is the combining of resources on 8, 9 and 19 to develop two strong 30 minute routes, rather than a mix of 60 and 30 minute routes.
- Matching of ridership levels with service offered including additional weekend service on the Route 215 connection between Downtown Riverside and Downtown San Bernardino, a reduction of frequency on Route 20 and a number of other minor modifications.
- Elimination of OmniLink Service in Chino Hills and Yucaipa, due to the duplication

with OmniGo service that has more than three times the ridership of OmniLink.

- Omnitrans is projected to see a 2.9% increase in ridership, reaching 16.4 million riders during 2015. This increase is driven by the introduction of sbX in late FY2014, but the ridership increase is offset by a fare increase, which reduces ridership.

► **FY2016 Service Proposals:**

- There are no fare changes proposed for FY2016.
- There are a series of service changes proposed that are designed to improve travel directness and time in West Valley. The primary design change is the development of more dedicated key north-south routes that provide direct unduplicated connections to the high-frequency future BRT/Rapid routes on Holt Boulevard and Foothill Boulevard.
- The straightening of service in West Valley impacts Route 65 (Central Avenue), 68 (Ramona Avenue), 80 (Vineyard Avenue), 81 (Haven Avenue), 82 (Milliken Avenue) and 83 (Euclid Avenue).
- Service on the east-west route on Baseline, Route 67, has a proposed change that shortens the route to serve as a key connection between Fontana and Chaffey College.
- There are also a number of key questions to be evaluated in the development of the FY2016 implementation plan: What has been the ridership transition from Route 2 to sbX and does it warrant further changes?; What is the status of the San

Bernardino Transit Center and corresponding Rail Projects?; Were the FY2015 changes successful or are adjustments needed?; What savings were generated from the proposed elimination of OmniLink and can they be implemented in an express/rapid route?; and, What is the status of the Goldline Extension to Azusa?

► **FY2017-2020 Considerations:**

- There are fare changes proposed in FY2017 and FY2019 which are 14% and 12%, respectively.
- Given the budgetary limitations, the planned hours of service remain constant from FY2017 through FY2020. This implies that all service changes would need to have a savings offset to any service increase. Since Omnitrans is proposing East Valley and West Valley changes in FY2015 and FY2016, Omnitrans does not propose any specific changes FY2017-2020 until the impact of the previous changes are known in late FY2015 and FY2016.
- Omnitrans does propose specific key considerations to be evaluated during these years that will help shape the annual implementation plans including: Status of funding and/or construction of West Valley Connector capital improvements and then develop corresponding timing plan to shift resources from existing Route 60 and 66 to the West Valley Connector?; What is the status of revenue service on Redlands Rail and should routing be



modified to serve as a feeder service to the Redlands Downtown Station?; and, What has been the performance of the West Valley Service improvements and the move towards more of a grid system?

## 1.11 Fare Policy

- ▶ Omnitrans' proposed fare policy is set based on the need to close a \$12.8 million funding shortfall that existed at the completion of the COA.
- ▶ Fare policy is in compliance with California's Transportation Development Act (TDA) Farebox recovery rules, half fare requirements for seniors and the disabled; no greater than twice fare for ADA service and fare equity considerations that are based on Title VI of the Civil Right Act of 1964.
- ▶ Omnitrans' current base fare is \$1.50. Other fares are set based on volume/usage discount strategies or regulations from this base fare. Omnitrans completed a local (California) and a national comparison and found that the average base fares were \$1.69 and \$1.75, respectively.
- ▶ Omnitrans proposes raising fares every other year in FY2015, FY2017 and FY2019. In each case, the base fare is proposed to increase \$0.25, which at these fare levels is the next easily transactable fare that meets farebox recovery targets. The three \$0.25 fare increases correspond to a 16%, 14% and 12% fare increase every other year.

- ▶ Omnitrans Board will have the opportunity to approve the FY2017 and FY2019 fare increases prior to implementation. The FY2015 fare increase is proposed to be implemented with simultaneously with the OmniConnects plan.
- ▶ Omnitrans proposes changing all fares generally in line with the percentage increases indicated above.
- ▶ Omnitrans proposes modifying the zone boundaries within the Access Zone Map by moving the dividing streets a few blocks to the west. The current boundaries from east-to-west are Wabash, Tippecanoe, Cactus, Etiwanda and Campus. The proposed boundary streets are Ford, E Street, Sierra, Milliken and Mountain. These changes are proposed to remain in compliance with ADA regulations given the proposed changes to Omnitrans Fixed Route service.

## 1.12 Title VI Fare and Service Equity Analyses

- ▶ Omnitrans is required by FTA guidelines to complete a Title VI Analysis of major service changes and fare changes as part of the planning process to ensure compliance with Title VI of the Civil Rights Act of 1964.
- ▶ The Fare Equity Analysis shows that the proposed changes in the OmniConnects Plan do not unfairly impact the low income or minority (LIM) population in terms of disparate treatment or disparate impact. The Fare Equity Analysis was completed based on rider intercept surveys that indicated race/ethnicity and also the fare types used.

- ▶ The Service Equity Analysis shows that Omnitrans does not unfairly impact the LIM population in terms of disparate treatment or disparate impact. The Service Equity Analysis was completed using geo-spatial analysis combined with US Census demographic information to evaluate the population served and impacted by each route proposal.

## 1.13 Public Outreach

- ▶ Public outreach for OmniConnects began with the output from the two rounds of Public Information Gatherings completed by AECOM in the development of the COA.
- ▶ In developing and reviewing the proposal within OmniConnects, Omnitrans reached out to riders, cities, stakeholders, neighboring transit providers, the Consolidated Transportation Service Agency and Omnitrans employees.
- ▶ Public input was gathered at 11 individual meetings with seven of the meetings occurring at major transit centers so that Omnitrans could reach directly out to the riding public rather than waiting for the public to come to Omnitrans.
- ▶ Omnitrans distributed information about OmniConnects proposals through the required newspaper legal ad in the Sun and in the Inland Valley Daily Bulletin. Omnitrans also disseminated information about the change and invitations to the meeting through take one flyers on all buses, press releases, email newsletters, Omnitrans.Org, and through the agency's strong social media presence.

- ▶ Omnitrans staff spoke with over 450 individuals regarding the plan and received over 190 comments.
- ▶ The comments generally related to fare and service changes.
- ▶ The public was generally opposed to any fare increase; however, once it was explained that Omnitrans hasn't raised fares in over five years and that the fare increase was necessary to meet funding requirements and retain funding members of the public generally thought the fare increases were reasonable. However, the public was also concerned about the frequency of fare increases.
- ▶ Many members of the public whom Omnitrans spoke with who did not leave comments were supportive of the service changes proposed, specifically the straightening out of West Valley routes.
- ▶ Primary concerns related to the service changes related to new transfers or longer walking distance to a bus stop.
- ▶ Disabled riders voiced concerns about three specific changes: service near the Chaffey College Learning Development Center on 9<sup>th</sup> St. in Rancho Cucamonga; Goodwill Industries on Palm Lane between 3<sup>rd</sup> and 4<sup>th</sup> Streets in San Bernardino; and Empire Bowl on Colton Ave in Redlands. Omnitrans evaluated these concerns and based on the public input and based on VTrans Travel Training History at the facility, Omnitrans will revise the proposal for the Chaffey College Learning Development Center when it is proposed for implementation. The other areas have adjacent service on another route and/or the ridership levels remain so low that the service levels are not sustainable. Access service will be available at both locations.
- ▶ Riders voiced concern over the proposed elimination of OmniLink, much more so in Yucaipa than in Chino Hills. Upon reviewing the comments, the majority of residents who voiced concern are within a very short walk (often less than 1/10 of a mile) from an OmniGo stop or are likely eligible for Access ADA paratransit service. So while the change has an immediate impact on the service that is currently used, very few current OmniLink riders are left without service. As the proposal draws near, Omnitrans will reach out to offer additional information about other transit options.
- ▶ The most common requests from the public were not specifically related to the OmniConnects Plan, but for longer service hours both on weekdays and weekends and for more frequent service on nearly all routes. While Omnitrans is supportive of increasing service hours and frequency, the financial resources are not available to do so at this time.

## 2 INTRODUCTION

Omnitrans is a Joint Powers Authority (JPA) established in 1976 to provide public transportation in the San Bernardino Valley. Omnitrans' JPA includes 15 cities and the County of San Bernardino. The JPA-member cities are Chino, Chino Hills, Colton, Fontana, Grand Terrace, Highland, Loma Linda, Montclair, Ontario, Rancho Cucamonga, Redlands, Rialto, San Bernardino, Upland and Yucaipa.

### 2.1 Mission

Omnitrans' mission is:

- ▶ To provide the San Bernardino Valley with comprehensive public mass transportation services which maximize customer use, comfort, safety, and satisfaction, while efficiently using financial and other resources in an environmentally sensitive manner.

### 2.2 OmniCONNECTS

OmniConnects is Omnitrans' FY2015-2020 Short Range Transit Plan (SRTP).

OmniConnects is Omnitrans' business plan to connect people, businesses and our community with safe, reliable and convenient public transportation in a financially and environmentally sustainable manner.

OmniConnects seeks to enhance Omnitrans' service to continue to meet the community's public transportation needs.

OmniConnects focuses on Omnitrans' community, riders, existing services, finances, and plans for the future. The plan is divided into 14 Chapters

- Chapter 1:** Executive Summary
- Chapter 2:** Introduction
- Chapter 3:** Our Community
- Chapter 4:** Our Riders
- Chapter 5:** Our Services
- Chapter 6:** Our Partners
- Chapter 7:** Financial Plan
- Chapter 8:** Standards & Performance Measures
- Chapter 9:** Sustainability
- Chapter 10:** Unconstrained Service Plan
- Chapter 11:** Constrained Service Plan
- Chapter 12:** Fare Policy
- Chapter 13:** Title VI Evaluation
- Chapter 14:** Public Comments

OmniConnects is built upon a series of reports that are available from Omnitrans that are not duplicated within this plan including the Comprehensive Operational Analysis (COA) of Omnitrans, regular performance monitoring, and ongoing rider and general public surveys.

### 2.3 Purpose of SRTP:

The Short Range Transit Plan (SRTP) sets the FY2015-2020 objectives in a six (6) year capital and operating plan, which is submitted to the Omnitrans Board of Directors and the San Bernardino Associated Governments for approval. The SRTP is typically updated every three (3) years. The FY2015-2020 update of the SRTP is called OmniConnects.

The SRTP is developed within the context of the Regional Transportation Improvement Plan overseen by the Southern California Association of Governments (SCAG).

The SRTP consists of information on Omnitrans services and operating characteristics, which are integrated into the Regional Transportation Improvement Plan (RTIP), State Transportation Improvement Plan (STIP), and Federal Transportation Improvement Plan (FTIP).

### 2.4 Goals

An integral element in developing OmniConnects was the establishment of key goals that build upon Omnitrans' mission statement. These goals assist in setting a strategy to deliver services to meet the community's needs. The key goals expressed in OmniConnects are:

- ▶ Deliver safe, reliable, clean, frequent convenient, comfortable and equitable service.
- ▶ Enhance Omnitrans' network design to increase ridership and minimize costs by reducing redundancy.
- ▶ Minimize impact to existing riders while seeking opportunities to expand ridership.
- ▶ Support the local economy by providing connections to where people want to go.
- ▶ Maximize cost recovery while charging a fair fare.

- ▶ Support initiatives that are financially and environmentally sustainable in the short and long term.
- ▶ Expand, maintain and improve existing vehicles, facilities and passenger amenities.

## 2.5 Strategies

In order to accomplish the goals outlined above and to continue to meet Omnitrans' mission, several strategies will be employed over the life of the OmniConnects plan. The strategies are consolidated into four key areas: 1) Core Mission, 2) Cost Efficiency, 3) Enhancing Connections, and 4) Partnerships.

### 2.5.1 Core Mission

These strategies target key elements of providing bus services and are broadly focused on matching ridership demand and service levels offered.

- ▶ Focus on the core mission of providing bus service that connects the communities of the San Bernardino Valley.
- ▶ Provide a range of bus services including express routes and community circulators, using the type of service that most efficiently meets ridership demand for each community.
- ▶ Evaluate every proposed project by the value it provides for customers, for the community and for the agency.
- ▶ Consider new services as market development routes with a defined trial period and ridership target.

### 2.5.2 Cost Efficiency

These strategies look for ways to reduce the local subsidy per passenger by finding additional grant funding or minimizing costs through other service delivery strategies.

- ▶ Leverage existing resources with potential new funding sources (such as available grants) in order to provide improvements for passengers and to make service more efficient.
- ▶ Make adjustments to routes, as needed, that move Omnitrans service to be more productivity-oriented, and reevaluate unproductive routes each time the Short Range Transit Plan is updated (every 2-3 years).
- ▶ Report route level statistics such as ridership, productivity, farebox recovery, subsidy per passenger, and on-time performance to the Board of Directors quarterly, so that the Board is informed of the mix of services Omnitrans offers and how they perform.
- ▶ Explore available technology for improved efficiency, such as the following:
  - Intelligent transportation systems (ITS) like transit signal priority (TSP) along high-traffic corridors.
  - Fare collection technologies to reduce boarding time.

### 2.5.3 Connections

These strategies look to improve the ease of multi-modal transfer connections while improving the

ability of passengers to transfer within Omnitrans' system or connect to a neighboring system.

- ▶ Take advantage of efficiencies from the sbX Green Line bus rapid transit route, such as adjusting other local bus routes to feed into the sbX Green Line.
- ▶ Provide connections with other transit systems (bus and rail), including future Redlands Rail service.
- ▶ Use transit centers to provide efficient transfer connections for passengers.
- ▶ Enhance transfer ease to neighboring transit agencies by improving cooperative service agreements to more seamlessly facilitate transfer timing and payments.

### 2.5.4 Partnerships

With limited funding projected in OmniConnects' planning horizon, the need for partnerships, both public and private, to offset costs or expand a revenue stream are crucial. The strategies listed below relate to partnership opportunities.

- ▶ Explore ways to reduce costs, such as sharing resources with other agencies or participating in joint procurements.
- ▶ Expand partnerships with the community, including schools, medical facilities and job centers.
- ▶ Support partner agencies' initiatives that have the potential to generate additional Omnitrans ridership (e.g., improvements to Metrolink

commuter rail service, or transit-oriented development).

- ▶ Align Omnitrans' goals, strategies, and plans with those of partner agencies including member cities, the County of San Bernardino, San Bernardino Associated Governments (SANBAG), Southern California Association of Governments (SCAG), and neighboring transit providers.

## 2.6 Recent Accomplishments

Since Omnitrans' last SRTP (FY2008-2013) was adopted in FY2007, Omnitrans has accomplished many things.

Since 2007, ridership has grown 9% and fare revenue is up 13%. Growing student and senior ridership has caused Omnitrans' ridership base to more closely reflect the diverse community Omnitrans serves.

Omnitrans has scored well in multiple Customer Satisfaction Surveys, with positive scores ranging from 82% positive public perception to a 91% positive customer perception.

The services and amenities Omnitrans provides customers has expanded and improved. This has been accomplished through the completion of three Transit Centers, the introduction of NexTrip real-time arrival information, the rebranding and deployment of New Flyer Xcelsior buses, the introduction of the Go Smart student pass program, and the development of the nearly completed sbX Green Line.

Omnitrans' seven key accomplishments that have helped shape the agency are described below.

### 2.6.1 sbX

sbX, Omnitrans' Bus Rapid Transit (BRT) service, is a frequent, limited-stop service that saves travel time with dedicated lanes and traffic signal priority. It includes a significant investment in passenger amenities such as stations with ticket vending machines, level boarding, public art, and real-time arrival information.

As of the writing of the SRTP, sbX Green Line is near completion with the start of revenue service expected in April 2013. The sbX Green Line on the E Street Corridor connects California State University, San Bernardino on the north to Loma Linda University Medical Center and the Jerry L. Pettis Memorial VA Hospital in the south. It is one of 10 planned sbX BRT corridors for the San Bernardino Valley.

When the SRTP is adopted, Omnitrans will have delivered a \$192 million project on-time and on budget to provide an enhanced service that is expected to deliver 1.4 million passenger trips per year. Additionally, the infrastructure investment in sbX coupled with the expected \$20 million investment in the adjoining San Bernardino Transit Center (SBTC) will help to revitalize San Bernardino.

### 2.6.2 Transit Centers

Through partnerships, Omnitrans has worked to deliver improved passenger amenities in many cities and at many stops. The largest improvements since the completion of the last SRTP were the construction and completion of

three transit centers: Chaffey College Transit Center, Yucaipa Transit Center and the Ontario Civic Center Transit Station.

- ▶ **Chaffey College Transit Center:** A four-bay transit center in the heart of Chaffey College's main campus in Rancho Cucamonga that opened in December 2010. The station has two large shelters and is prewired for NexTrip information. Chaffey Transit Center serves 800 passengers per weekday. This transit center was built as a pass-through of Proposition 11 funds from CalTrans through Omnitrans to Chaffey College. Coupled with the rollout of the Go Smart program, students at Chaffey College have much greater access to high quality transit as a result of this project.

- ▶ **Yucaipa Transit Center:** An eight-bay transit center built adjacent to Yucaipa City Hall that opened in July 2010. The station has eight shelters, driver restroom facilities and a design that fits seamlessly into the civic center's craftsman design. The transit center was built by the city of Yucaipa as Omnitrans provided a pass-through of Federal America Recovery and Reinvestment Act (ARRA) funding and Local Transit Funds. The introduction of the Yucaipa Transit Center was a necessary precursor to the development of the successful OmniGo Local Circulator Routes in Yucaipa. This transit center serves 400 passengers per weekday.

- ▶ **Ontario Civic Center Transit Station:** An on-street transfer station that provides enhanced amenities at a major transfer hub along Holbrook Boulevard between Euclid Avenue and Sultan Avenue which surrounds the Ontario Civic

Center. The multiple stops in this area provide service to approximately 550 passengers per weekday. Omnitrans partnered with the City of Ontario to deliver this project by passing through federal and local funding to the city.

Additionally, Omnitrans is partnering with SANBAG to deliver the San Bernardino Transit Center (SBTC). The 22-bay transit center will replace an on-street transfer mall that currently serves as Omnitrans' primary transfer location for approximately 6,000 passengers per weekday. Plans for the SBTC have evolved over the last ten years. SANBAG recently awarded a construction contract to build the SBTC, with completion currently slated for mid-2015.

### 2.6.3 Go Smart

Omnitrans' Go Smart program is a University Pass program where all students at partnering schools can ride Omnitrans fare-free. Go Smart is funded through student registration fees and/or administrative funds at partner schools. As of April 2013, Go Smart partner schools include the following: Chaffey College; Crafton Hills College; San Bernardino Valley College; California State University, San Bernardino; the Art Institute of California-Inland Empire; and a few charter high schools.

Go Smart began as a series of one-week promotional periods at the four largest colleges in Omnitrans' service area. These promotions showed proof of concept in August and September in 2009 and 2010.

This was followed by a one-year pilot program funded through JPA member cities and county

AB2766 subvention funds which led to a vote by the student bodies of Chaffey, Valley and Crafton Hills Colleges to self-impose a student transportation fee. These passed with positive approval votes of 92%, 82% and 55%, respectively.

During its first full year, Go Smart delivered 1.5 million boardings while achieving revenue neutrality. Additionally, 13,186 students tried Go Smart during the first year in FY2012, representing 24.8% of the students at partner schools

### 2.6.4 Rebranding

In August 2012, Omnitrans unveiled its third new logo since Omnitrans' inception in 1976. Agency rebranding elements included a new logo, the tagline "Connecting our Community," fleet graphics for local fixed route vehicles, bus stop signs, a refresh of bus stop amenities, facility signs, printed materials, employee apparel, updated agency mascot, and a new generation agency website.

Omnitrans' rebranding effort began as an element of the agency's 2009-14 strategic plan, with the desired goal to increase overall awareness among the general public. Workshops on brand strategy led to the development of a logo, color scheme and tagline that appropriately reflected the vital service that Omnitrans provides to the community, including the environmental aspects.

The rebranding implementation coincided with the delivery of 20 New Flyer Xcelsior buses. By timing the rebranding with arrival of new buses, the rebranding costs associated with vehicle livery were minimized.

Feedback on the rebranding from community stakeholders, Omnitrans' passengers, both on-board and in social media, and from Omnitrans' peer agencies has been overwhelmingly positive. The rebranded website helped generate an immediate 55% increase in website traffic.

### 2.6.5 NexTrip

In January 2013, Omnitrans provided real-time bus arrival information to passengers. NexTrip provided passengers with an instant way to answer the age-old question of "When is my bus coming?"

NexTrip provides up-to-the-minute arrival times for any Omnitrans bus at any stop via Omnitrans Website, smart phone apps, QR code reader, SMS text, or interactive voice response (IVR)-based phone call.

Within six months of the launch of NexTrip, Omnitrans was delivering approximately 85,000 real-time arrival notifications to passengers per month, equivalent to 7% of a typical month's boardings.

### 2.6.6 OmniGo Community Circulators

In September 2010, Omnitrans launched OmniGo Community Circulators in the cities of Chino Hills, Grand Terrace and Yucaipa. Traditionally, these three cities have had the lowest ridership levels in Omnitrans system.

In an attempt to add mode share, reduce costs and improve service in these communities, Omnitrans developed a community circulator program that became known as OmniGo, Your Hometown Shuttle.

OmniGo was developed using Job Access Reverse Commute (JARC FTA §5316) funding and resources that had previously been deployed for OmniLink general public dial-a-ride in the cities of Chino Hills and Yucaipa.

Immediately following the launch of OmniGo, ridership in the three cities surged. During the last twelve months of the previous OmniLink system with nine vehicles in service, OmniLink delivered 45,000 trips.

During the 12 months prior to December 2013, OmniGo delivered 142,000 trips. This is an increase of 215% using fewer vehicles in a different service configuration.

The remaining three vehicles in OmniLink service carry 18,000 boardings per year; however, the majority of these are within walking distance of existing OmniGo routes. The total combined ridership increase for OmniGo and OmniLink is 255% compared to the previous system, with OmniGo carrying 89% of the two services ridership.

As a result of this increase in ridership, OmniGo was successful in bringing down OmniLink's cost per passenger. In FY2010, an average passenger trip on Omnlink cost Omnitrans \$22.24. During FY2013, OmniGo's cost per passenger was \$12.87 a reduction of 42% despite a modest level of inflation that would have typically driven costs slightly higher over the period.

### 2.6.7 Fare Stability

Omnitrans last raised fares in September 2009, which was in fiscal year 2010 (FY2010). Since that

time, Omnitrans has successfully maintained passenger fares at the same level.

In the FY2008-2013 SRTP, the plan was to increase fares in FY2011 and FY2012. If those increases had occurred, Omnitrans' base fare would be 33% higher today at \$2.00 instead of the existing \$1.50.

In the midst of a recession with area unemployment levels peaking at 15%, the Board directed staff to maintain fares in order to continue to provide affordable transportation options for the community.

While maintaining fares, Omnitrans' farebox recovery rate improved due to a combination of growing ridership, a slight reduction in service, and a significant effort to maintain costs.

Omnitrans' blended farebox recovery ratio that includes both general public and specialized services grew from 20.36% in FY2008 to 21.25% in FY2013. Looking at only fixed route bus service, farebox recovery rate grew from 21.86% in FY2008 to 23.17% in FY2013. This exceeds the minimum target of 20% set forth by California's Transportation Development Act (TDA).

### 2.7 Guiding Documents and Groups

The OmniConnects plan is based on many planning and partner agencies documents that are all aimed at improving transit, transportation and coordination of effort between transit and land use. Many documents feed into the OmniConnects program. The key guiding documents are:

- ▶ **FY2008-2013 Short Range Transit Plan**, which is the current SRTP and represents status quo policies for Omnitrans.
- ▶ **Comprehensive Operational Analysis (COA) of Omnitrans**, which was a recently completed detailed review of all aspects of Omnitrans operations. The COA will be used especially for existing conditions, proposed standards and policy enhancements, public outreach (general public, Board members, city staff and other stakeholders), routing, and status quo financial projections. The feedback provided by the COA Ad Hoc committee will be utilized as well.
- ▶ **SANBAG's 2009 Long Range Transit Plan**, is a long-term vision for transit in San Bernardino County and will be used to verify uniformity of transit vision and goals within the San Bernardino Valley.
- ▶ **SCAG's 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy** for uniformity of transit vision and goals within Southern California.
- ▶ **Several Regional BRT and related land use studies**, including:
  - Baseline BRT Study, City of Highland;
  - Foothill Blvd BRT Study, City of Rancho Cucamonga;
  - Foothill/5<sup>th</sup> St. Corridor BRT Study SANBAG and SCAG;
  - Holt Blvd. Corridor Mobility & Streetscape Strategic Plan, City of Ontario;
  - Holt Blvd/San Bernardino Ave Corridor Alternatives Analysis, Omnitrans;

- Sierra and Valley Land Use Study, City of Fontana; and,
- Downtown Fontana Transit Oriented Development Study, City of Fontana.

In addition to these formal reports, several groups provided specific direct input into OmniConnects. These include the following:

- ▶ **Omnitrans Board of Directors**, through two workshops held in early 2013 to reaffirm Omnitrans' policies and goals.
- ▶ **Omnitrans Board of Directors Planning and Programs Committee**, which recommended a detailed path forward at workshops in January and February 2014.
- ▶ **Public Hearings**: The COA process involved two extensive public input sessions. The summary of the input sessions along with the recommendations derived from them was used in the initial formation of the SRTP.

Once OmniConnects' draft service and fare recommendations were prepared, Omnitrans held 11 public input meeting in March and April 2011 including four public hearings to refine the recommendations. During the same time period Omnitrans also met with Cities' staff at two meetings and with SANBAG Planning and Transit staff.

- ▶ **Omnitrans' Senior Leadership Team**: Provided strategies to meet established goals and refine goals.

- ▶ **Omnitrans' Service Planning, Monitoring and Implementation Committee**: Served as the technical advisory committee that provided input and reviewed the SRTP prior to submission to Senior Leadership or the Board of Directors.

Omnitrans also reached out to several other community groups during the planning process. These included SANBAG's PASTACC, VTrans' Travel Trainers and staff from Rolling Start.

## 2.8 Upcoming Challenges

Omnitrans' primary challenge during the OmniConnects planning horizon is delivering additional transit options and improving service levels while Omnitrans' funding level is expected to grow at a rate that may just cover core inflation.

The outcome of the Comprehensive Operational Analysis of Omnitrans was a status quo financial plan that shows Omnitrans with a cumulative operating deficit of \$12.8 million between FY2015 and FY2020, which matches the planning horizon of OmniConnects.

Omnitrans' non-fare revenue (Local Transportation Funds, State Transit Assistance Funds, Measure I Funds and similar) is projected to increase by 2.3% per year between FY2015 and FY2020. Omnitrans has to juggle the demands of maintaining existing services, expanding service (request for more routes, more frequency on existing routes and longer service hours) and maintaining low fares, while also experiencing the broad based cost increases driven by inflation.

The projected non-fare revenue increases are not sufficient to maintain all existing service, expand service and keep fares at current levels. The OmniConnects plan addresses these challenges and delivers a six-year program that meets these challenges head-on in order to enhance the transit offered in the San Bernardino Valley.



## 3 OUR COMMUNITY

Omnitrans serves the urbanized area of San Bernardino County from the cities of Chino Hills, Montclair and Upland on the west to Yucaipa on the east. The northern boundary is the San Bernardino foothills and the southern border is the Riverside County line. This area is referred to as the San Bernardino Valley.

### 3.1 Service Area Characteristics

Key characteristics of the San Bernardino Valley and Omnitrans' service area include:

- ▶ **Geographic Size:** 456 square miles.
- ▶ **Population:** 1.48 million residents.
- ▶ **Population Density:** 3,240 people per square mile.
- ▶ **15 Cities:** Chino, Chino Hills, Colton, Fontana, Grand Terrace, Highland, Loma Linda, Montclair, Ontario, Rancho Cucamonga, Redlands, Rialto, San Bernardino, Upland, and Yucaipa.
- ▶ **Unincorporated County:** Omnitrans provides service to the unincorporated county areas interspersed within the 15 cities, including the communities of Bloomington, Mentone and Muscoy.
- ▶ **Colleges and Universities:** California State University, San Bernardino, Chaffey College, Crafton Hills College, San Bernardino Valley College and many technical and trade schools.

- ▶ **Largest Employers:** Loma Linda University Medical Center; Ontario International Airport; Kaiser Foundation Clinic; Colton Joint Unified School District; San Antonio Community Hospital; San Manuel; San Bernardino County Sheriff; California State University, San Bernardino; Community Hospital; San Bernardino County Schools; ESRI; Roadway Express; Caltrans; and, Pettis Memorial VA Medical Center.

- ▶ **Minority:** Omnitrans service area is a minority-majority area where 74% of the population is defined as a minority.

### 3.2 Community Characteristics

These key service area characteristics describe at a high level the community that Omnitrans serves. However, with 15 individual cities, the cities Omnitrans serves are quite diverse.

Within the service area, San Bernardino and Ontario are the higher population density urban centers, while communities like Yucaipa are more rural and less densely populated.

Ontario and Chino are projected to see fast population growth during the next 10-25 years, while other cities are projected to remain closer to the current population.

The Cities of San Bernardino and Colton tend to have higher proportions of relatively lower-income residents, while Rancho Cucamonga, Upland and Chino Hills are more affluent.

Residents in the cities of San Bernardino, Rialto and Colton tend to be younger than residents in the communities of Grand Terrace and Yucaipa.

The following maps and exhibits illustrate Omnitrans' service area overall. They also illustrate areas of key difference. The following maps include Omnitrans' service area, residential density, employment density, employment and residential density, and largest employers.

As evidenced in these exhibits, Omnitrans does not serve a traditional central business district. Instead, Omnitrans serves fifteen cities and the intermingled and unincorporated communities each of which possesses very different demographic characteristics.

Exhibit 3 shows the geography of the cities Omnitrans serves.

Exhibit 4 shows that Omnitrans' service area consists of denser areas interspersed with less densely populated regions. The greater the population density, the more efficient and effective traditional fixed route service is going to be. Going from one resident-dense area to another may necessitate crossing less-dense, and hence, low-productivity areas. Areas with high transit usage are often broken up by intervening areas of low transit usage, and the entire service area is elongated along an east-west axis which necessitates long commutes and/or multiple transfers.

Exhibit 3: Omnitrans Service Area with Cities Identified

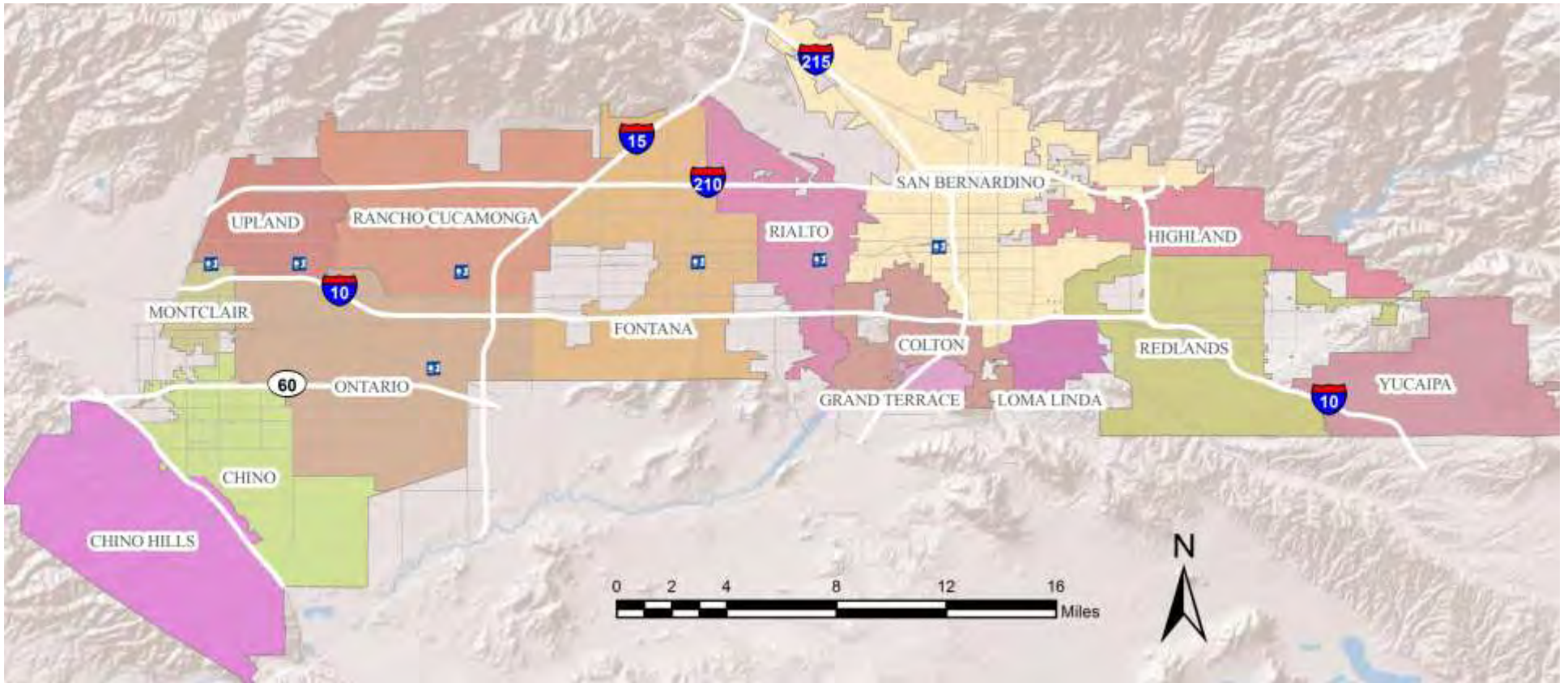


Exhibit 4: Omnitrans' Service Area Population Densities, 2013

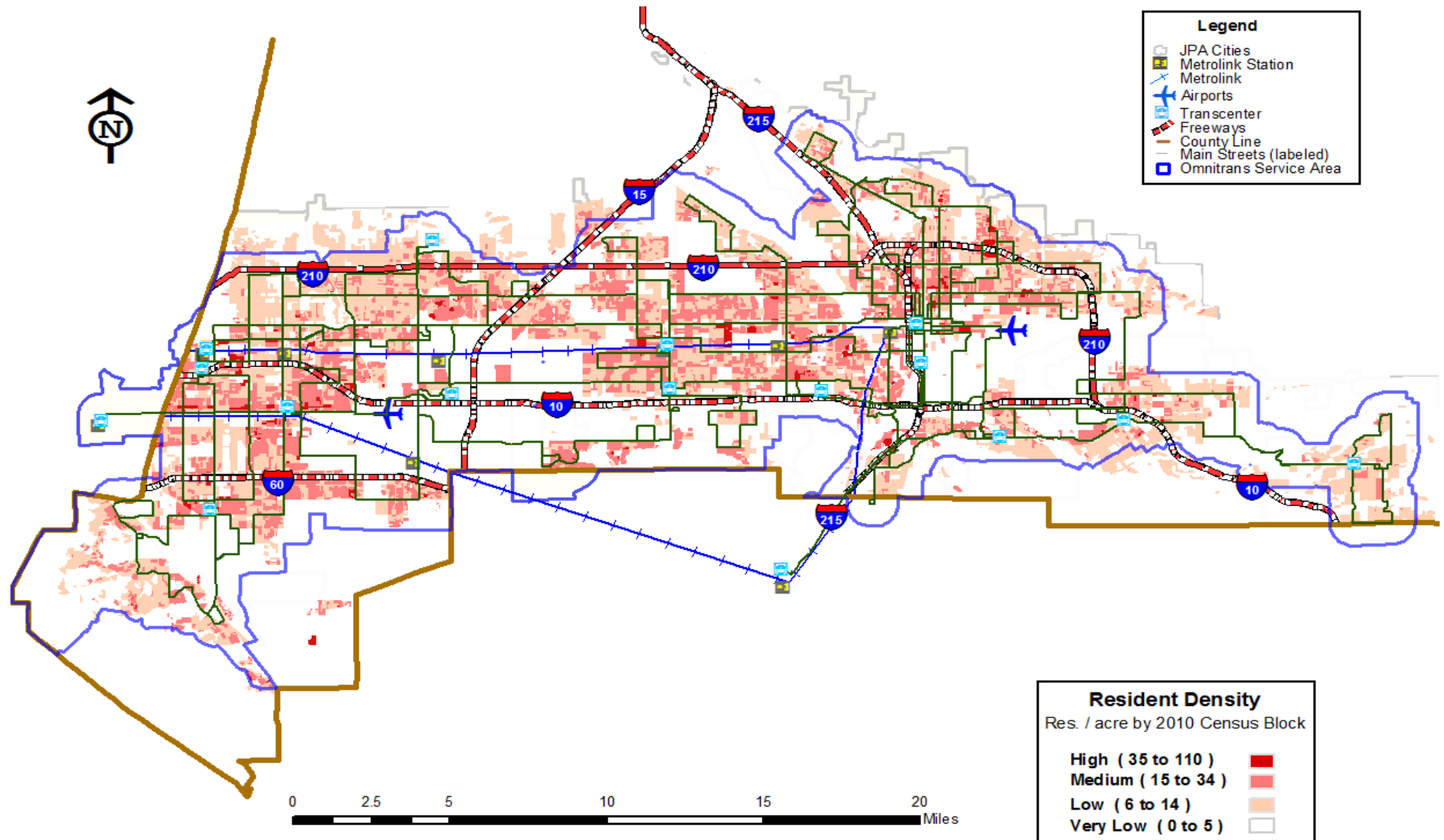


Exhibit 5: Omnitrans' Service Area Employment Densities, 2013

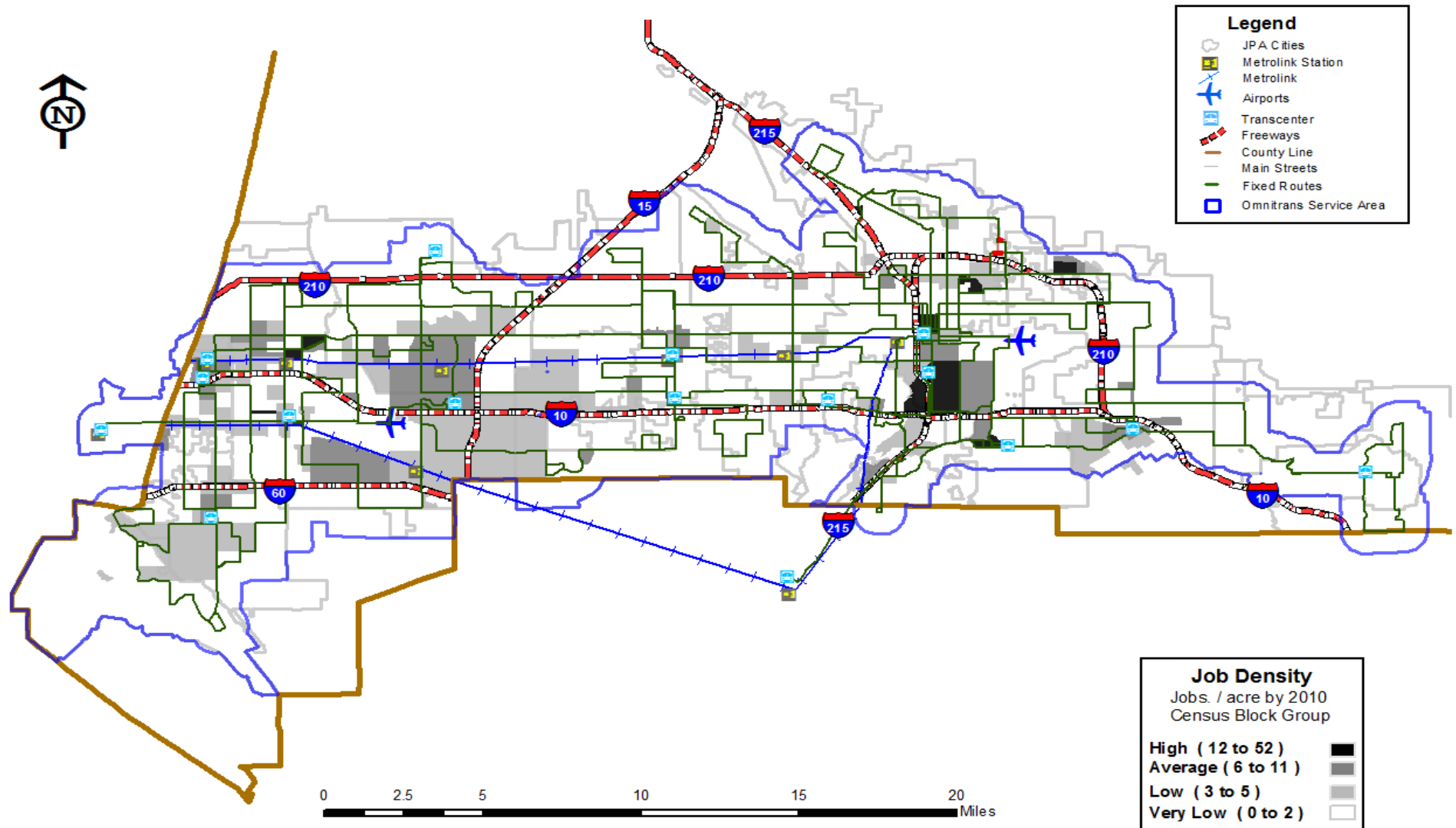
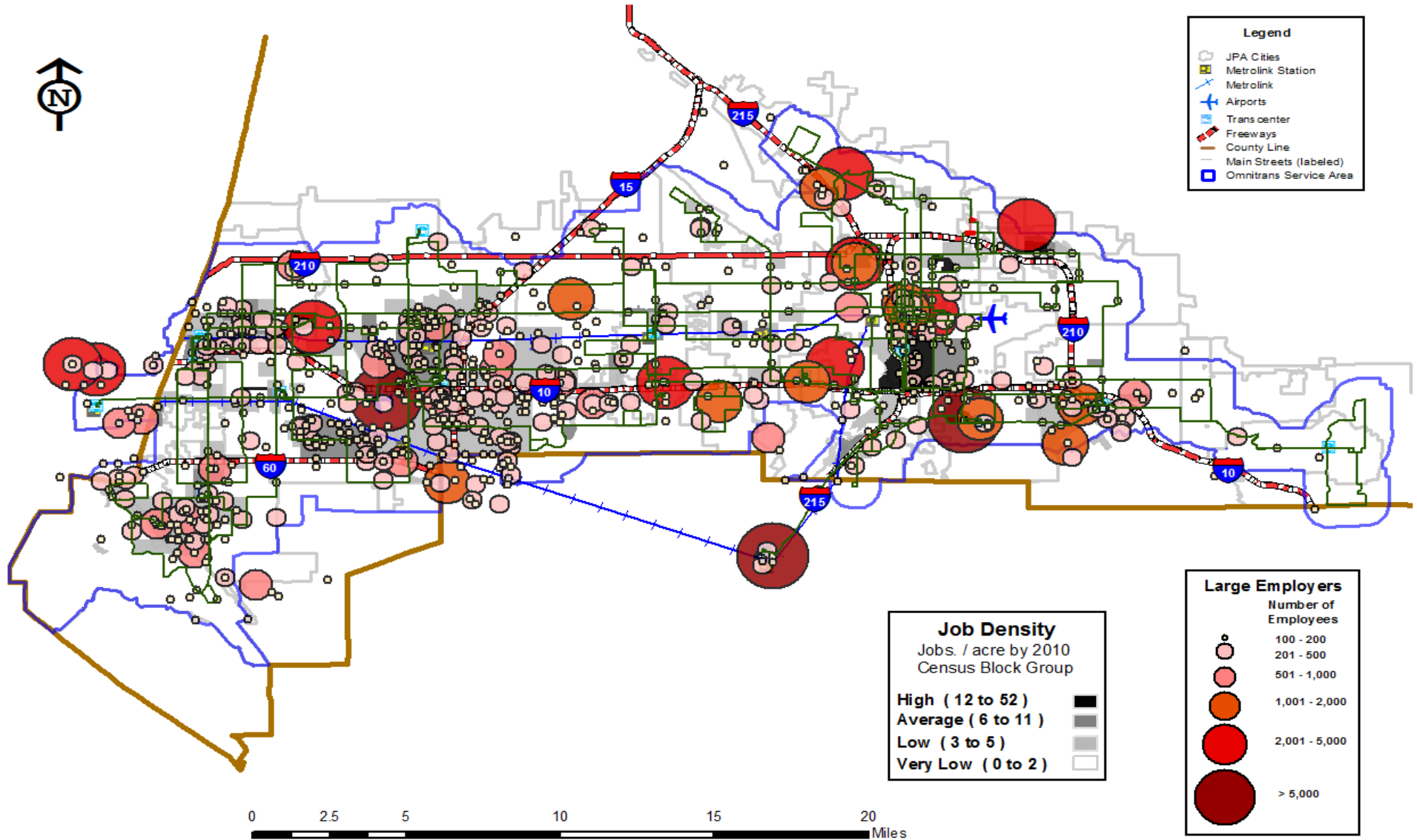


Exhibit 6 Major Employers and Job Density in Omnitrans' Service Area, 2013



Attachment: City of Chino Appeal Request Form and Supporting Documentation (Appeal of the Draft

Exhibit 7: Omnitrans' Bivariate Map with Population and Employment Densities along with Stop Level Ridership Activity

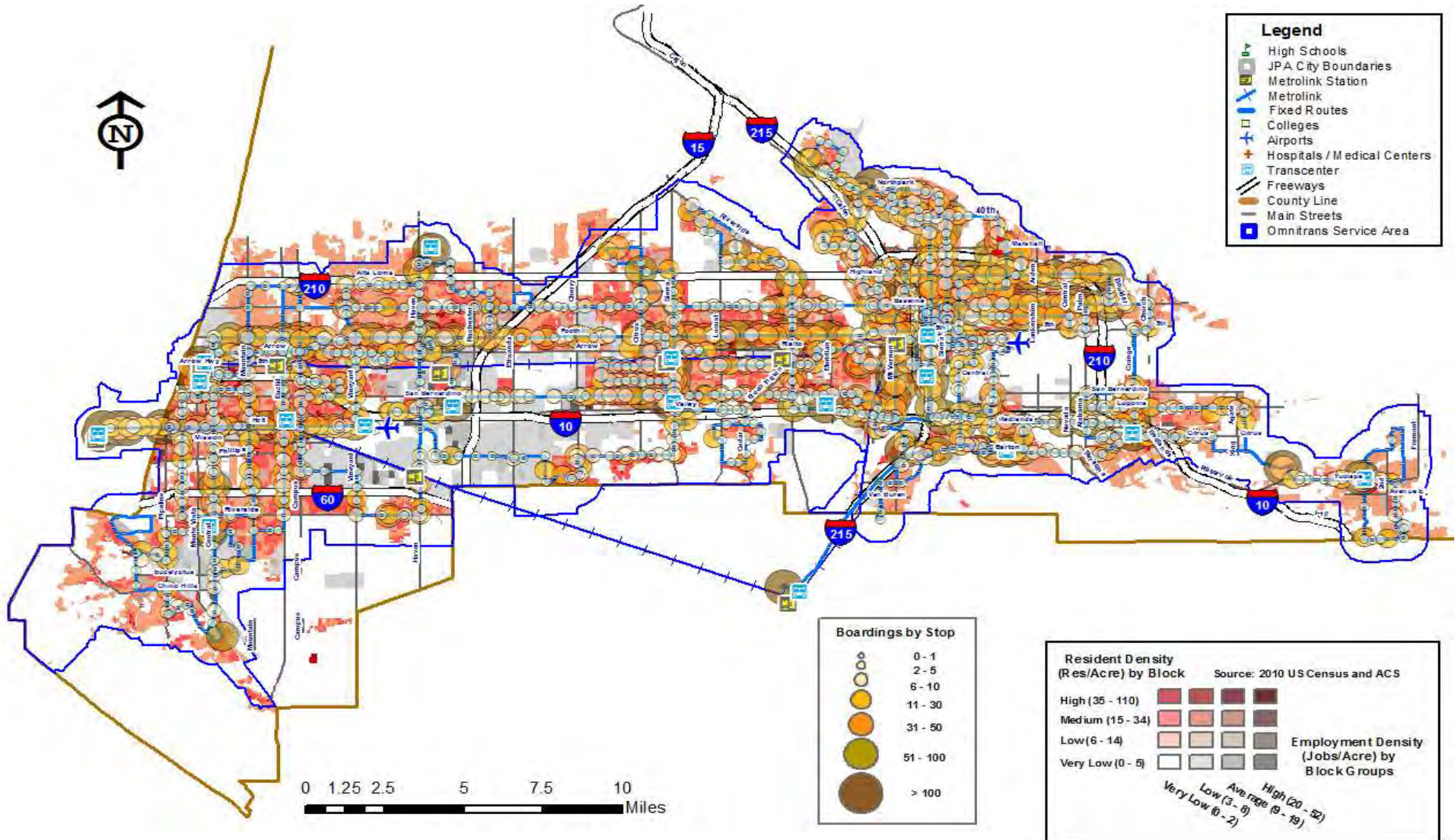


Exhibit 4 also shows the general spatial distribution of population and job densities over Omnitrans’ service area. Resident density in the service area is not uniform in distribution, and has two major clusters with limited residential activity in the industrial areas of west Fontana and east Ontario, and near the San Bernardino airport.

Exhibit 5 illustrates employment density within the service area. The major employment density rich regions are centered in the cities of San Bernardino, Ontario and Loma Linda.

Exhibit 6 shows where major employers are located in the service area. Major employers were defined as those with at least one-hundred employees. By juxtaposing both job densities and the locations of major employers, more information about employment can be obtained. Exhibit 7 shows a bivariate map that combines employment and residential density into one map.

**3.3 City Demographics**

Detailed city profiles can be found in Phase I of the Comprehensive Operational Analysis (COA) of Omnitrans. Key city level demographics are included in this section.

Exhibit 8 shows population, household and job statistics for the West Valley cities of Chino Hills, Chino, Montclair, Ontario, Upland, Rancho Cucamonga and Fontana.

Population density in the cities ranges from 1,700 people per square mile in Chino Hills to a high of 7,333 people per square mile in Montclair. The median ages of West Valley cities are similar, with the cities of Ontario and Fontana at slightly under

**Exhibit 8: West Valley City Demographics**

	Chino Hills	Chino	Montclair	Ontario	Upland	Rancho Cucamonga	Fontana
<b>Population</b>	74,799	77,983	36,664	163,924	73,732	165,269	196,061
<b>Land Area (sq. miles)</b>	44	21	5	49	15	37	31
<b>Population Density</b>	1,700	3,713	7,333	3,345	4,915	4,467	5,441
<b>Median Age</b>	36.6	33.2	30.7	29.9	36.1	34.5	28.1
<b>% over age 65</b>	7.0%	7.3%	8.4%	6.7%	6.7%	7.9%	5.7%
<b>Households</b>	22,941	20,772	9,523	44,931	44,931	54,383	49,111
<b>Home Ownership</b>	83.2%	67.0%	57.8%	55.1%	57.5%	68.5%	70.0%
<b>Avg. Household Size</b>	3.5	3.6	3.9	3.8	2.9	3.2	4.1
<b>% of Residents that use Public Transit</b>	2.1%	1.5%	3.0%	2.6%	2.5%	2.0%	2.4%
<b>Median Household Income</b>	\$107,727	\$73,633	\$52,299	\$55,923	\$59,351	\$80,430	\$64,381
<b>% Minority</b>	66.6%	72.2%	85.6%	81.8%	55.8%	57.3%	84.6%
<b>% Below Poverty Level</b>	4.1%	6.2%	15.2%	12.7%	8.9%	4.8%	12.5%
<b>% Veteran</b>	5.2%	6.8%	3.6%	4.1%	7.9%	6.4%	4.4%
<b>Jobs</b>	8,522	42,670	15,067	102,678	25,187	55,790	43,761
<b>Ratio of Jobs to Population</b>	0.11	0.55	0.41	0.63	0.34	0.33	0.22
<b>Avg. Salary per Job</b>	\$38,129	\$41,057	\$38,903	\$42,624	\$39,458	\$41,780	\$44,501

30 years and the other west valley cities seeing a median age between 30 and 36.

The City of Montclair, the densest city in the group, had the highest transit usage rate at 3.0%, but the city also had the highest share of minorities 85.6% and the lowest median household income. This demonstrates that it is likely a confluence of factors that bring about higher transit ridership. The three densest cities in Omnitrans service area are in West Valley.

Ontario has the highest concentration of jobs compared to its population, which is indicative of need of greater inflow transit options in the morning and outflow options in the

afternoon/evening. Conversely, cities with a low ratio would generally need the opposite travel patterns.

The ratio of jobs to population in West Valley ranged from a low of 0.11 jobs per person in Chino Hills to a high of 0.63 in Ontario. The only other city in West Valley over 0.5 was Chino.

Exhibit 9 shows population, household and job statistics for the East Valley cities of Rialto, Colton San Bernardino, Grand Terrace, Loma Linda Redlands, Highland and Yucaipa.

**Exhibit 9: East Valley Cities Demographics**

	Rialto	Colton	San Bernardino	Grand Terrace	Loma Linda	Redlands	Highland	Yucaipa
<b>Population</b>	99,171	52,154	209,924	12,040	23,261	68,747	53,104	51,367
<b>Land Area (sq. miles)</b>	21	15	58	4	8	35	13	27
<b>Population Density</b>	4,722	3,477	3,619	3,344	3,101	1,964	4,085	1,902
<b>Median Age</b>	28.3	28.4	28.5	36.1	33.2	36.2	30.6	37.8
<b>% over age 65</b>	7.0%	7.0%	7.9%	12.5%	13.9%	13.1%	7.7%	13.3%
<b>Households</b>	25,202	14,971	59,283	4,403	8,764	24,764	15,471	18,231
<b>Home Ownership</b>	66.9	51.0	51.5	60.8	1,228	1,171	1,993	3,038
<b>Avg. Household Size</b>	3.9	3.4	3.3	2.8	2.5	2.7	3.4	2.8
<b>% of Residents that use Public Transit</b>	2.3%	2.2%	3.1%	1.0%	1.7%	1.4%	1.8%	0.7%
<b>Median Household Income</b>	\$51,785	\$45,927	\$40,233	\$70,884	\$47,751	\$63,483	\$54,439	\$56,132
<b>% Minority</b>	87.4%	87.0%	81.0%	53.6%	63.0%	46.0%	69.2%	34.1%
<b>% Below Poverty Line</b>	14.7%	17.9%	27.4%	3.9%	12.7%	10.1%	17.3%	10.4%
<b>% Veteran</b>	5.4%	4.3%	5.6%	9.8%	5.2%	8.6%	7.7%	10.7%
<b>Jobs</b>	20,837	22,301	94,171	2,749	17,415	38,007	5,496	8,878
<b>Ratio of Jobs to Population</b>	0.21	0.43	0.45	0.22	0.75	0.55	0.10	0.17
<b>Avg. Salary per Job</b>	\$44,514	\$43,838	\$42,992	\$43,078	\$46,011	\$42,753	\$40,082	\$40,996

The East Valley cities’ population density ranges from a low of over 1,900 people per square mile in Yucaipa and Redlands to a high of 4,722 people per square mile in Rialto.

There is greater disparity in median ages in East Valley than in West Valley. The median age in Grand Terrace, Redlands and Yucaipa exceed 36, which was the highest in West Valley. Conversely, the median age in Rialto, Colton and San Bernardino are below that of the youngest West Valley city.

The City of San Bernardino has the highest reported percentage of residents that use transit

at 3.1%, which is the highest of all of the cities that Omnitrans serves.

The lowest transit usage share is in Yucaipa, at 0.7%, which is the lowest of the cities Omnitrans serves.

In East Valley, Loma Linda has the highest concentration of jobs compared to its population, which is indicative of need of greater inflow transit options in the morning and outflow options in the afternoon/evening. The ratio of jobs to population in East Valley ranges from a low of 0.10 jobs per person in Highland to a high of 0.75 in Loma Linda. The only other city in East Valley over 0.5 was Redlands.

### 3.4 Population & Employment Growth Trends

Residential population and employment densities are currently concentrated in two regions: the City of San Bernardino and the cities of Ontario and Fontana. The two most populous cities in the service area are San Bernardino and Fontana followed closely by Rancho Cucamonga and Ontario. Population projections for the 15 cities in the service area from 2010 to 2035 are shown in Exhibit 10.

Omnitrans’ service area population is expected to grow dramatically in the coming years. In the process, a shift in demographics from San Bernardino and the eastern portion of the service area to Ontario and the western portion of the service area is also projected. This trend is demonstrated by Exhibit 11.

Ontario has one of the highest population growth rates of all fifteen cities. Projections indicate that by 2015, Ontario’s population will exceed that of Rancho Cucamonga’s, and by 2025, Ontario will be more populous than Fontana, and second only to San Bernardino in number of residents. By 2030, its population is projected to outstrip even San Bernardino’s.

With respect to employment data, the two cities with the highest numbers of jobs continue to be San Bernardino and Ontario. Currently, Ontario leads San Bernardino in job numbers, has the highest number of jobs of any JPA city, and this disparity is expected to grow in the coming years.



**Exhibit 10 Population Projections for JPA Cities**

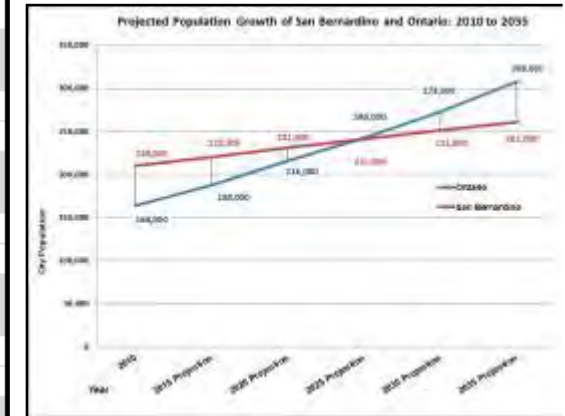
Population Estimates for Omnitrans' Service Area (2010 to 2035)										
CITY	2010	2015	2020	2025	2030	2035	Δ 2010-20	%Δ 2010-20	Δ 2010-35	%Δ 2010-35
Chino	78,000	83,000	89,000	94,000	101,000	107,000	11,000	14.1%	29,000	37.2%
Chino Hills	75,000	76,000	77,000	77,000	78,000	78,000	2,000	2.7%	3,000	4.0%
Colton	52,000	56,000	61,000	64,000	68,000	72,000	9,000	17.3%	20,000	38.5%
Fontana	196,000	209,000	223,000	234,000	246,000	259,000	27,000	13.8%	63,000	32.1%
Grand Terrace	12,000	12,000	13,000	13,000	14,000	14,000	1,000	8.3%	2,000	16.7%
Highland	53,000	57,000	60,000	63,000	67,000	70,000	7,000	13.2%	17,000	32.1%
Loma Linda	23,000	25,000	27,000	28,000	30,000	32,000	4,000	17.4%	9,000	39.1%
Montclair	37,000	38,000	40,000	41,000	42,000	44,000	3,000	8.1%	7,000	18.9%
Ontario	164,000	188,000	216,000	243,000	273,000	308,000	52,000	31.7%	144,000	87.8%
Rancho Cucamonga	165,000	166,000	167,000	167,000	167,000	167,000	2,000	1.2%	2,000	1.2%
Redlands	69,000	72,000	75,000	79,000	84,000	88,000	6,000	8.7%	19,000	27.5%
Rialto	99,000	104,000	110,000	115,000	120,000	125,000	11,000	11.1%	26,000	26.3%
San Bernardino	210,000	220,000	231,000	241,000	251,000	261,000	21,000	10.0%	51,000	24.3%
Upland	74,000	75,000	77,000	78,000	79,000	80,000	3,000	4.1%	6,000	8.1%
Yucaipa	51,000	54,000	56,000	58,000	60,000	62,000	5,000	9.8%	11,000	21.6%
<b>Total Municipal Population</b>	<b>1,358,000</b>	<b>1,435,000</b>	<b>1,522,000</b>	<b>1,595,000</b>	<b>1,680,000</b>	<b>1,767,000</b>	<b>164,000</b>	<b>12.1%</b>	<b>409,000</b>	<b>30.1%</b>
Unincorporated Areas	126,000	133,000	141,000	148,000	155,000	163,000	15,000	11.9%	37,000	29.4%
<b>Omnitrans Service Area Pop</b>	<b>1,484,000</b>	<b>1,568,000</b>	<b>1,663,000</b>	<b>1,743,000</b>	<b>1,835,000</b>	<b>1,930,000</b>	<b>179,000</b>	<b>12.1%</b>	<b>446,000</b>	<b>30.1%</b>
Riverside Additional	33,000	36,000	39,000	42,000	46,000	50,000	6,000	18.2%	17,000	51.5%
Pomona Additional	65,000	71,000	78,000	85,000	92,000	101,000	13,000	20.0%	36,000	55.4%
<b>GRAND TOTAL</b>	<b>1,582,000</b>	<b>1,675,000</b>	<b>1,780,000</b>	<b>1,870,000</b>	<b>1,973,000</b>	<b>2,081,000</b>	<b>198,000</b>	<b>12.5%</b>	<b>499,000</b>	<b>31.5%</b>
<b>SAN BERNARDINO COUNTY</b>	<b>2,035,000</b>	<b>2,219,000</b>	<b>2,419,000</b>	<b>2,637,000</b>	<b>2,875,000</b>	<b>3,134,000</b>	<b>384,000</b>	<b>18.9%</b>	<b>1,099,000</b>	<b>54.0%</b>

\* Projections for the years 2010, 2020, and 2035 were obtained from SCAG. The intervening years (2015, 2025, and 2030) were interpolations taken from growth rates derived from these data points.

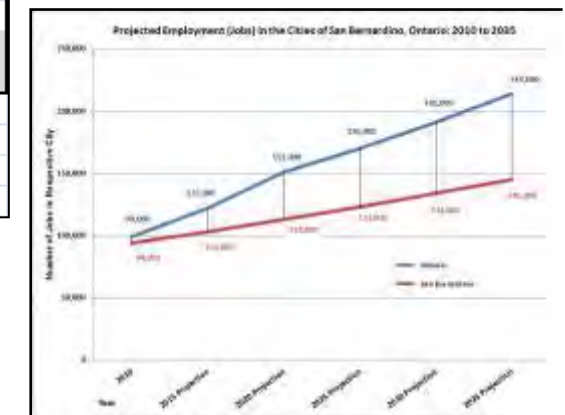
NOTE: Data were taken from, and revised according to, the SCAG RTP 2012 Forecast. They were revised using local input and the latest data from the 2010 Census, California Employment Development Department (EDD), and California Department of Finance.

Together, these data lead to the observation that the concentrated centers of residents and employment are currently split and tend to be focused in San Bernardino and Ontario. However, the trend is shifting westward for employment opportunities, and by 2020 the primary concentration of jobs will be found in the western portion of the service area.

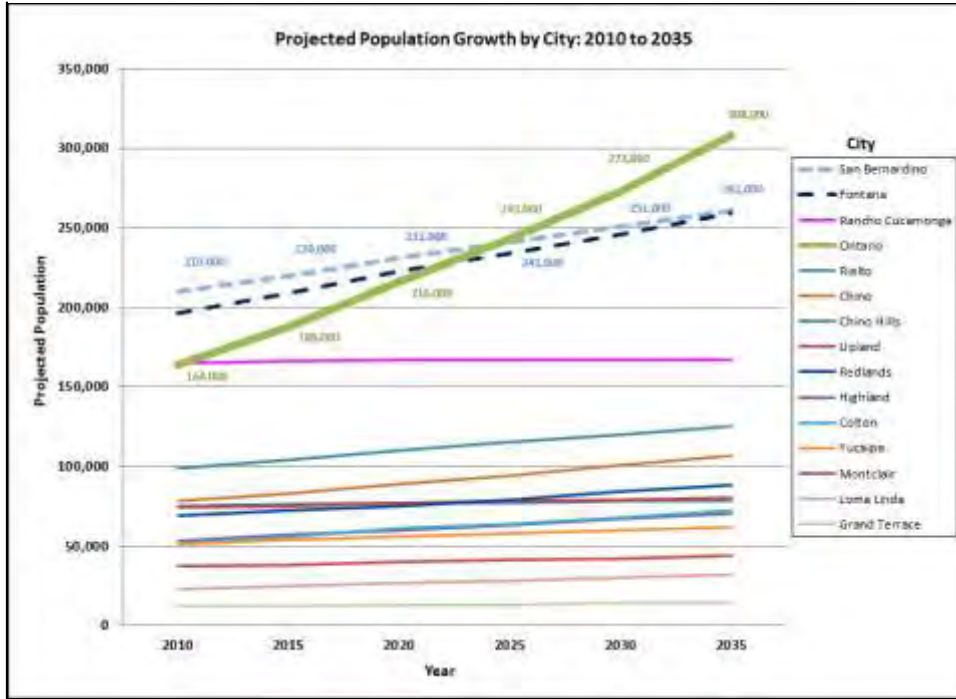
**Exhibit 11 Projected Population Growth of San Bernar and Ontario**



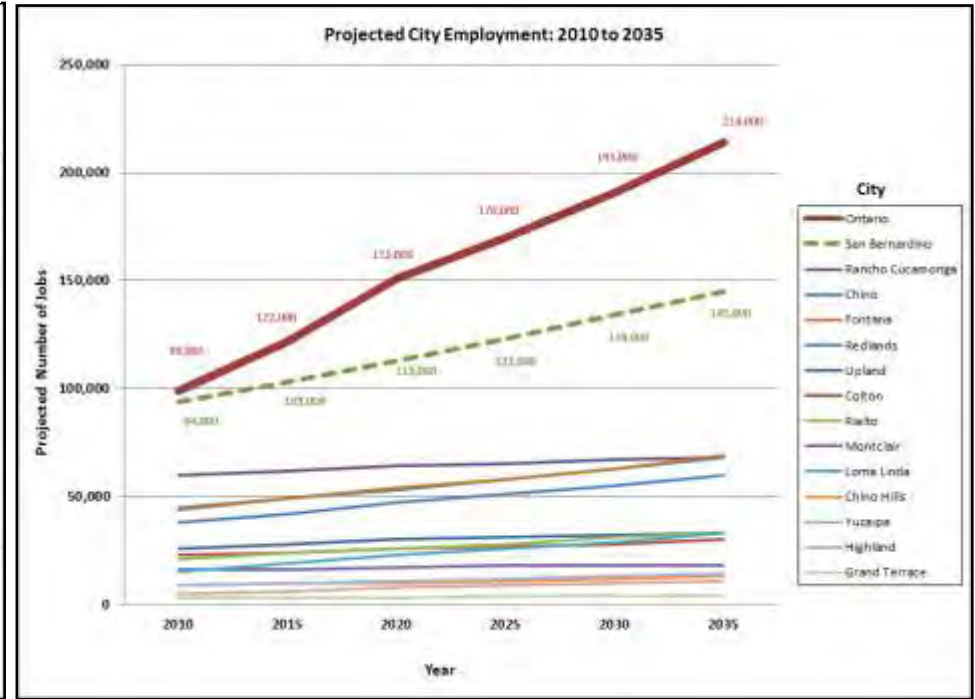
**Exhibit 12 Projected Jobs for San Bernardino and Ont**



**Exhibit 13: Projected Population Growth by City**



**Exhibit 14: Projected Job Growth by City**



From these exhibits, it can be seen that the cities with the most dynamic population growth are Ontario, San Bernardino, and Fontana. Of these, the most dynamic growth is to be seen in Ontario.

Some cities have high growth rates but significantly lower populations (i.e., Colton, Rialto, Chino), while others are built out and do not expect much growth (i.e., Rancho Cucamonga, Upland, Montclair).

With respect to employment, however, the issue is very clear, as seen in Exhibit 15. From the first year in 2010, West Valley offers more jobs than the East (roughly 3,000 more), and the difference between them will only grow (till 2035, when the west is projected to offer 15,000 more jobs than

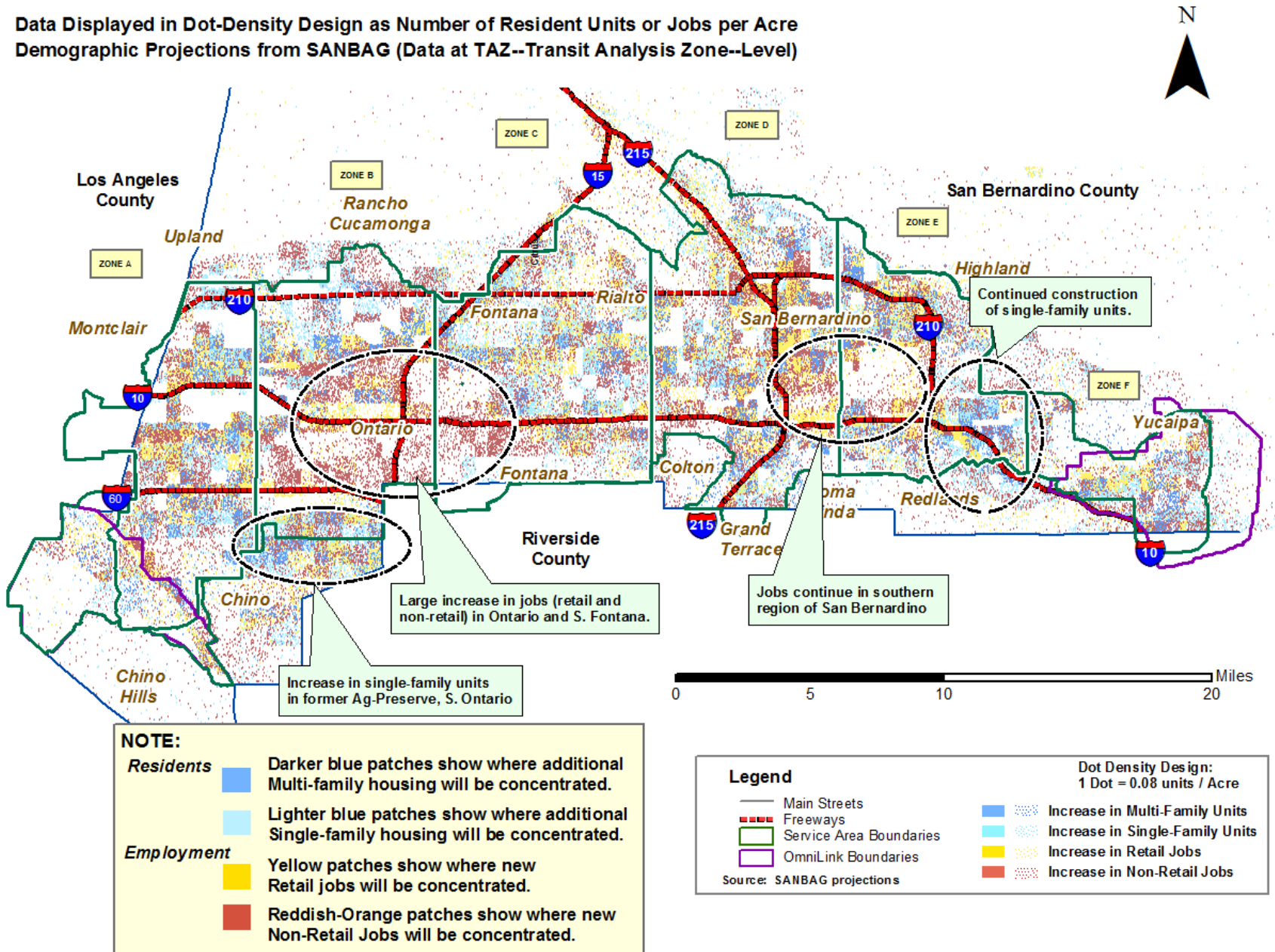
the east). Ontario’s growth in job opportunities outpaces all other cities from 2010 to 2035.

Longer term, more precise projections of job and population growth can be seen in the Exhibit 15, which uses dot-density to illustrate projected regions of resident and job growth in the next quarter century.

Exhibit 15 Projected Areas of Growth for Residents and Jobs, Omnitrans' Service Area

# Omnitrans Service Area in 2035

Data Displayed in Dot-Density Design as Number of Resident Units or Jobs per Acre  
Demographic Projections from SANBAG (Data at TAZ--Transit Analysis Zone--Level)



Attachment: City of Chino Appeal Request Form and Supporting Documentation (Appeal of the Draft

### 3.5 Young and Elderly Populations

The employment and population characteristics described above correlate with the distribution of the young and elderly populations within Omnitrans service area.

Age is a significant determinant of transit usage, as both younger and older segments of the population tend to be more limited in mobility choice. As such, areas where younger or older people cluster demographically tend to be areas of potentially greater transit demand.

While both seniors and youth are more likely to ride public transit than other age cohorts, the demand from each group is different, as can be seen spatially in Exhibit 16 and Exhibit 17.

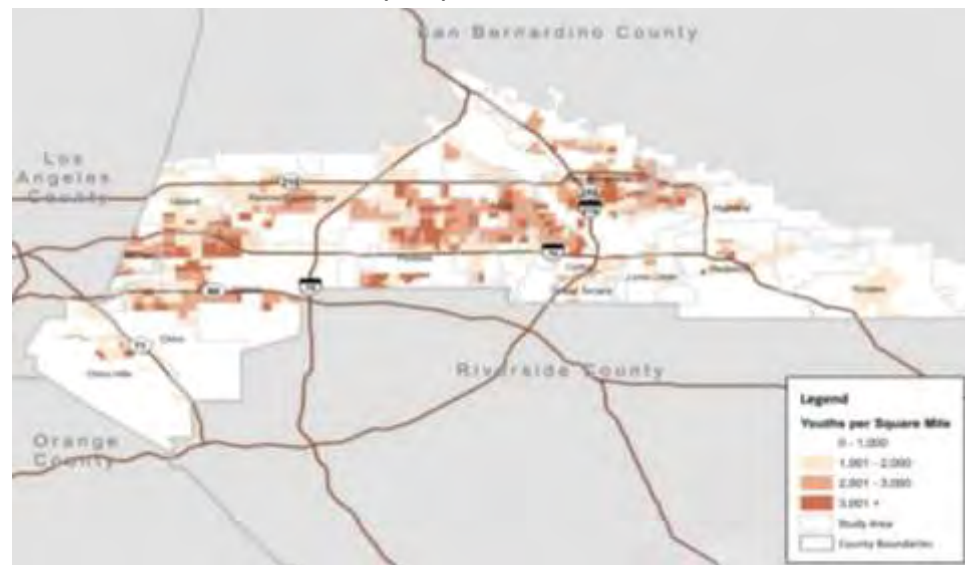
Higher numbers of younger people tend to cluster centrally in the service area, especially in cities and communities lying between the 10 and 210 freeway corridors or associated with either of the freeways.

Older populations tend to locate more often to the north of the I-210 freeway or south of the I-10 freeway or at the periphery of Omnitrans' service area.

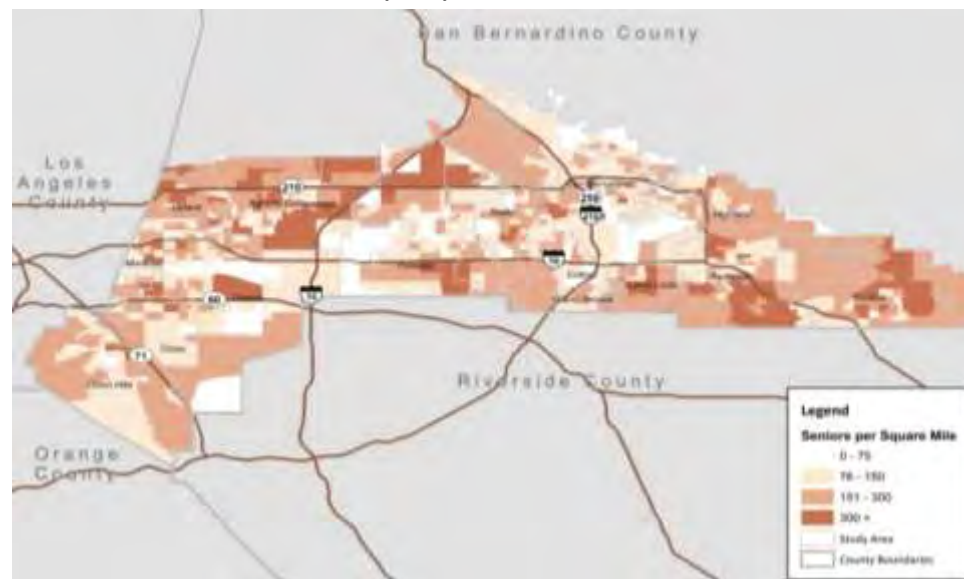
The elderly population trends indicate that Omnitrans will continue to see demand growing at the edges of the service area, particularly for community circulator service and for services like Access (ADA paratransit). While age is not a qualifying ADA condition, age increases the likelihood of having a disability that may be ADA qualifying for origin-to-destination paratransit service.

Conversely, the concentrations of youth are where higher productive services to schools, colleges, universities or technical schools would be needed.

**Exhibit 16: Youths per Square Mile, Omnitrans' Service Area**



**Exhibit 17: Seniors per Square Mile, Omnitrans' Service Area**



### 3.6 Income and Poverty

The cities on the periphery tend to be more affluent and trend toward an older demographic. In contrast to peripheral affluence, the more centrally-located cities have the highest incidence of poverty. For instance, the City of San Bernardino has the highest rate of poverty, with 27.4% of its residents falling below the poverty line. Exhibit 19 shows the spatial distribution of residents in Omnitrans' service area who live below the poverty line.

The distribution of median household incomes within the service area reveals that more affluent populations are found at the periphery, away from higher resident concentrations. This coincides with the situating of older residents in less-densely populated areas. The distribution of median income by census tract is shown in Exhibit 18.

Similar to the youth/elderly distinctions above, the services Omnitrans offers need to be tailored to Omnitrans' target demographics. Both low-income and high-income workers need faster and time-efficient services in order to routinely use public transportation. Those with higher incomes often need additional amenities before considering public transit usage. Meeting these disparate transit needs will continue to be a challenge Omnitrans faces.

Exhibit 18: Median Household Income in Omnitrans Service Area

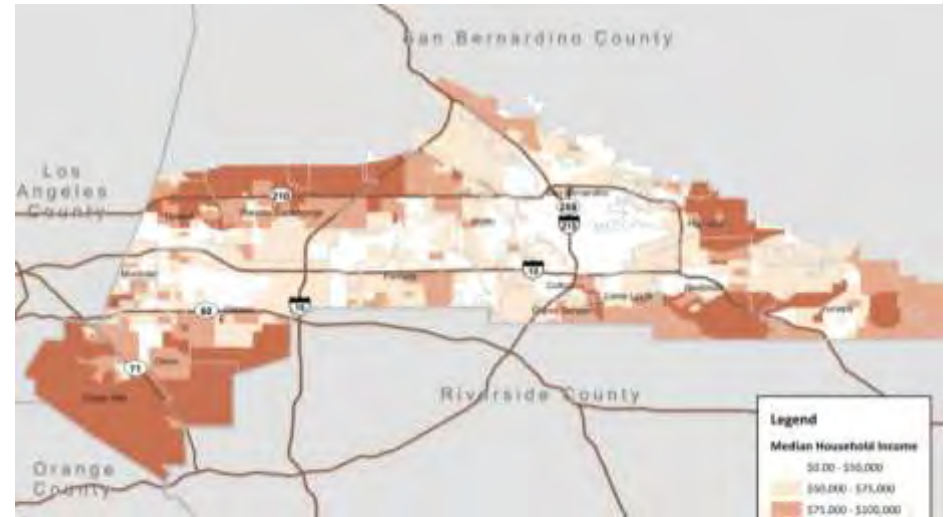
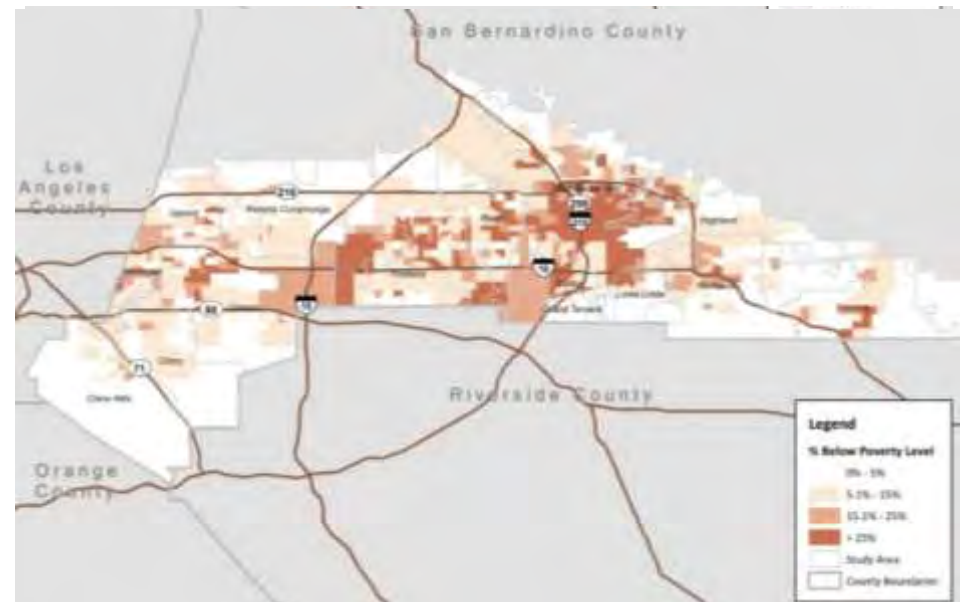


Exhibit 19: Percentage of Residents below Poverty Level in Omnitrans' Service Area



## 3.7 Ridership by City

The demographic, socioeconomic and land use characteristics of each community levels of transit usage in each community. Exhibit 20 shows Omnitrans fixed route boardings by city for FY2011 including unincorporated areas and the two areas (Downtown Riverside and Pomona) that Omnitrans serves outside of our service area. The data shows all boardings including and excluding transit or transfer centers. The number excluding transfer centers more closely associates with the population and employment activity within the cities. Including the transfer centers over emphasis cities were residents of all cities transfer.

Overall, San Bernardino, the city with the largest population has the greatest number of boardings. It also has the highest boarding per capita at an average of 18 boardings per person per year.

Grand Terrace, the city with the smallest population, also has the smallest overall ridership. The ridership per capita averages 1.5 boardings per person per year.

Cities with OmniGo service, Yucaipa, Grand Terrace and Chino Hills, have the lowest overall per capita ridership levels. This can be explained both by the demographics, primarily income levels, and population density. These factors are why OmniGo has been the preferred service delivery method, rather than expansion of the larger traditional 40-foot buses.

Additionally, the data presented here (FY2011) underestimates the ridership per capita in the OmniGo cities. Since FY2011, OmniGo ridership has increased by an additional 32%.

Exhibit 20 – FY 2011 Omnitrans Ridership by City

JPA Member CITY	2011 Population *	Annual Boarding (FY2011)	
		All Boardings	All Boardings Except Transit Centers
San Bernardino	211,076	5,417,138	3,957,233
Fontana	198,456	2,016,807	1,127,690
Rancho Cucamonga	168,181	749,448	654,581
Ontario	165,392	1,196,410	781,070
San Bernardino County (unincorporated)	121,334	712,504	615,556
Rialto	100,021	793,451	793,451
Area Served outside of San Bernardino County	94,923	294,792	56,916
Chino	78,537	289,440	207,391
Chino Hills	75,345	49,011	49,011
Upland	74,207	401,583	401,583
Redlands	69,231	439,734	277,950
Highland	53,444	585,282	585,282
Colton	52,498	709,207	507,601
Yucaipa	51,717	172,868	118,180
Montclair	37,031	678,611	348,484
Loma Linda	23,395	274,234	170,973
Grand Terrace	12,109	18,274	18,274

## 4 OUR RIDERS

In FY2013, Omnitrans delivered 16.1 million passenger trips. Average weekday boardings were just over 54,000 during the year. System total ridership trends over the last five years have shown an increase of 9% in ridership, which slightly outpaced the nationwide transit industry.

Omnitrans' ridership varies in age, ethnicity and gender. The most recent survey of Omnitrans' customers completed in April 2013 confirmed findings of previous surveys that Omnitrans' typical rider is a female between the ages of 19-29 years old, who rides transit to work or to school.

The basic demographic patterns can be seen in Exhibit 22.

### 4.1 Rider Characteristics

In 2011, as part of the Before Study for sbX, Omnitrans conducted an on-board rider intercept survey. Key demographic and travel demand findings from the survey include:

- ▶ **Age:** More than half of Omnitrans riders are 39 years old or younger. The largest segment, that totaled 26 percent of riders, was between the ages of 20-29 years old. The smallest share

Exhibit 21: Distribution of Riders by Age

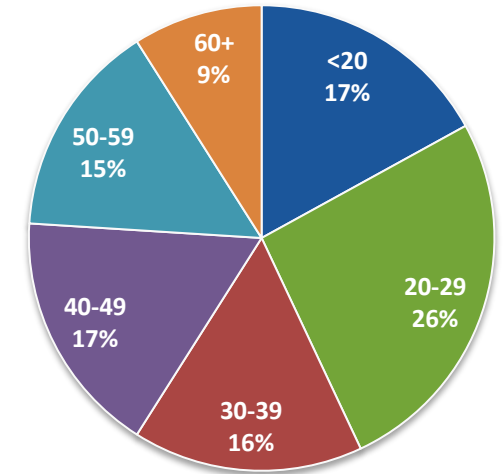
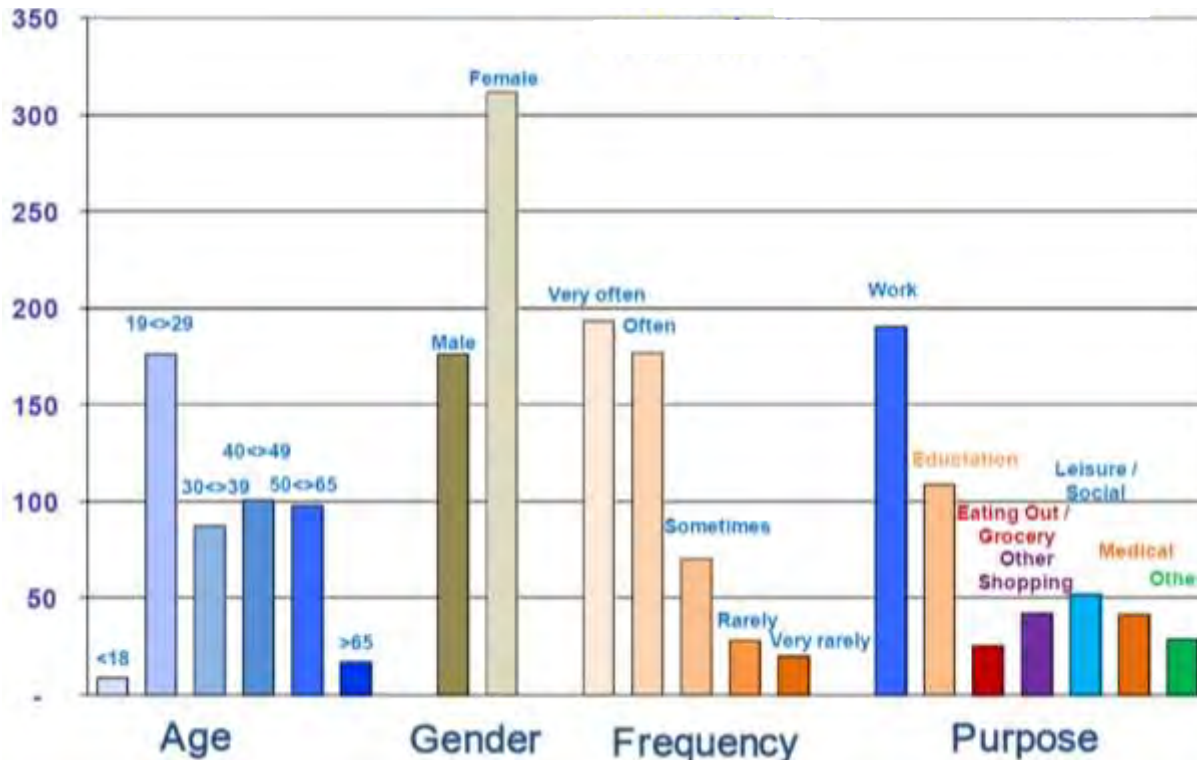


Exhibit 22: Omnitrans Rider Demographics from ABBG Customer Satisfaction Survey (n=506)



of riders was 60 years old or older at 9%. The rider age distribution is shown in Exhibit 21.

- ▶ **Vehicle Availability:** More than half of the riders indicated they had at least one auto in their household. Yet, only 18 percent of the survey participants stated they had an option of driving alone if bus service was no available.
- ▶ **Driver's License:** 45% of the riders surveyed reporting having a driver license.

► **Key Destinations:**

- Work: 34% of trips are home/work trips.
- School: 16% of trips were home/school trips.

► **Days of Travel:**

- Weekdays: 70% of riders travel on weekdays.
- Saturdays: 41% of riders travel on Saturdays.
- Sundays: 30% of riders travel on Sundays.

Review of data collected from rider surveys dating back to 1994 have also shown that the majority of riders have been using our bus services for over two years (53%). The 2011 survey showed that 28 percent of Omnitrans bus riders have been riding a year or less, up from 17 percent in 2007.

The majority of riders report being in the work force, with 27 percent employed full-time, 20 percent working part-time and 5 percent self-employed. Students made up 16 percent of passengers.

In 2011, a quarter of riders reported that they were unemployed or not employed, in comparison with 18 percent of non-riders.

Nearly two-thirds of riders live in a household that earns less than \$35,000 annually. Most riders (61%) reported earning less than \$20,000 per household. In contrast, over half of non-riders surveyed reported household income levels of at least \$50,000 per year.

In addition, the 2011 survey of Access and OmniLink indicated that users of both of these

demand-response services are more transit-dependent than fixed-route riders. Only 18 percent of OmniLink and only 7 percent of Access riders have a driver's license compared to almost half (45%) of fixed route riders.

Omnilink and Access riders also tend to be more long-term users of the service. 90 percent of Access riders and 71 percent of OmniLink riders have ridden for more than two years.

The primary trip purposes for Access were medical (30%), work (28%), and school (23%). For OmniLink most common trips were to shopping (48%), medical (36%), and school (7%).

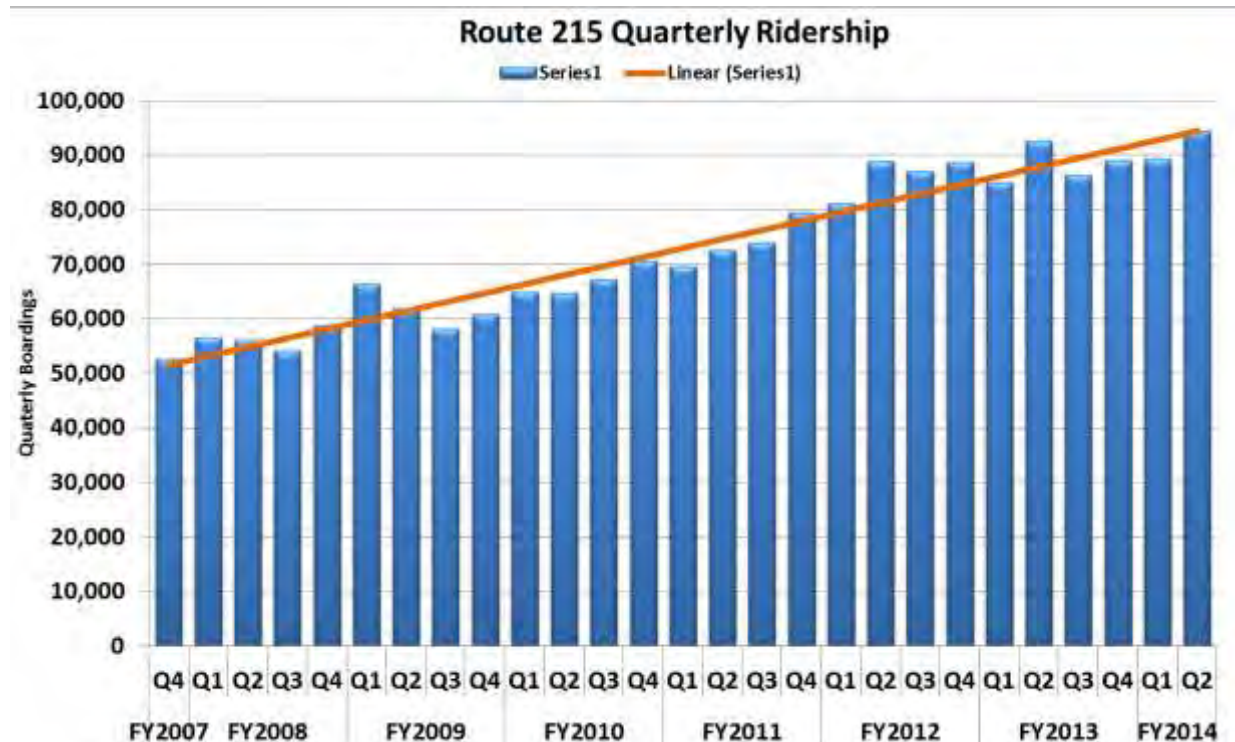
## 4.2 Express Route Commuters

Riders continue to express the need for increased regional connectivity, which can be seen by the growth of Omnitrans' freeway express route, Route 215, which connects Downtown San Bernardino to Riverside via Interstate 215.

Omnitrans conducted a survey of nearly 400 express route passengers during November 2012 to determine their interest in expanding this type of service.

The results indicated that nearly 64% of the current express riders were interested in

Exhibit 23: Omnitrans Freeway Express Ridership by Quarter





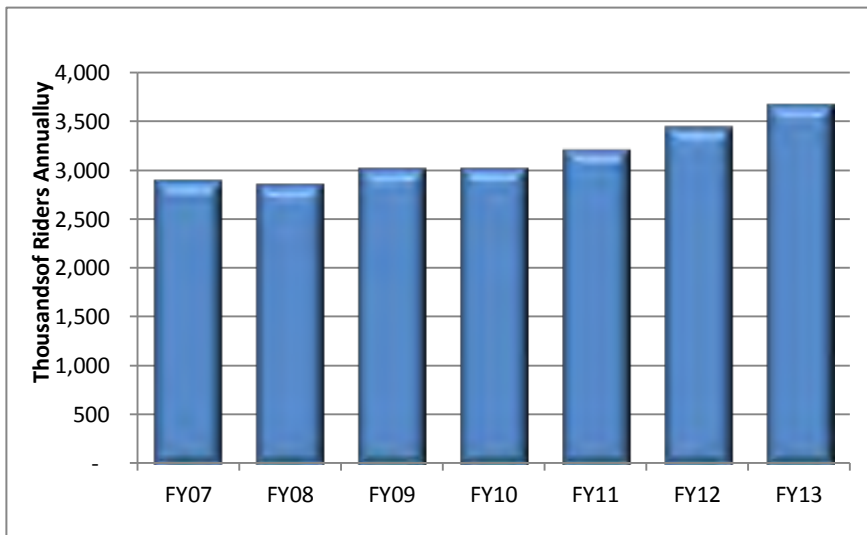
additional express routes. The Route 215 has displayed a successful ridership trend and is one of the fastest-growing routes over the last five years. Route 215 has grown by 58% since its current configuration was put in place in FY2008. Over the same time, Omnitrans overall service has grown by 9%. Neighboring transit agencies, including Riverside Transit Agency and Foothill Transit, have also seen significantly faster growth on their freeway-based express routes than on traditional local bus service.

The same rider survey indicated that a slight majority (51%) of riders would be willing to pay a higher fare for freeway express service. Of those willing to pay more, typically they were willing to pay between \$0.25 and \$0.50 more for a freeway express trip.

### 4.3 Senior and Student Ridership

Ridership data shows that Senior and Student fare

**Exhibit 25: Omnitrans Senior & Disabled Ridership from FY2007-FY2013**



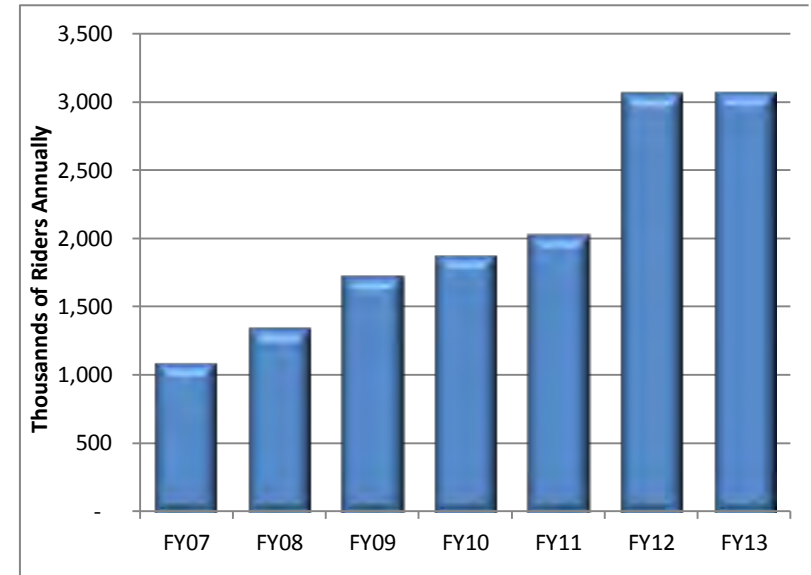
categories are the fastest-growing fare categories.

Between FY 2007 and FY 2013 ridership system wide grew by 4.3 percent. During the same period, senior ridership grew by 26.7% (see Exhibit 25) and student ridership nearly tripled with growth of 181%.

This trend was led by Omnitrans implementing new programs such as the Go Smart fare and the Omnitrans travel training bus.

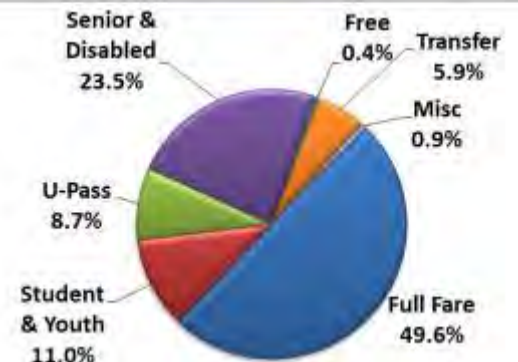
Omnitrans successfully implemented the Go Smart program for colleges, universities, high schools and trade schools. This program provides students at participating schools and educational institutions a discounted pre-paid group fare through their school. Since FY 2007 through FY 2013, student ridership has increased approximately 19% each year (Exhibit 24). This enabled Omnitrans to build upon the existing student ridership and provide that segment of riders with a program tailored to fit their fare needs. In FY 2013, Go Smart accounted for 8.7 percent. Ridership trends indicated that full fare customers and students make up over half (69.7%) of Omnitrans' total fixed route ridership, see Exhibit 26 - FY 2013 Fare Type Comparison. In

**Exhibit 24: Omnitrans Student Ridership from FY2007-FY2013**



FY 2013, ridership displayed a significant increase from years past; however, fare media report indicated that the full fare category actually decreased by 1 percent, while the student category grew by 5.1 percent compared to the previous year. The senior/disability/Medicare discounted fare accounted for 6.6 percent of trips.

**Exhibit 26 - FY 2013 Fare Type Comparison**



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## 5 OUR SERVICES

Omnitrans offers a family of services designed to match the service with the land use, ridership activity and needs of the community.

Omnitrans' family of services, as seen in Exhibit 27, includes local fixed route, express fixed route, bus rapid transit (BRT), community circulators, general public demand response, and American's with Disabilities Act (ADA) paratransit demand response services.






Since the adoption of the FY2008-2013 SRTP, two services have been added to Omnitrans' family of services: sbX and OmniGo.

The sbX Green Line, the first in a future system of 10 sbX lines, is scheduled to begin service in April 2014. The sbX Green Line is a significant service enhancement along Omnitrans' local route 2, which has historically been one of Omnitrans' best performing routes. sbX service characteristics are detailed in Section 5.1 sbX.

OmniGo was introduced in September 2010 as a way to improve service offered, increase ridership and utilize grant funding in communities that had previously only been served with OmniLink.

OmniGo routes were implemented in Chino Hills, Grand Terrace, and Yucaipa. The result was a significant increase in ridership in the communities compared to the previously existing OmniLink services. Now that OmniGo has proven successful, Omnitrans must decide which service(s) remain: OmniGo and/or OmniLink.

Exhibit 27: Omnitrans' Family of Services

Service	Type	Brand	Image	Description
Fixed Route	Bus Rapid Transit (BRT)	sbX		BRT service mirrors light-rail service on rubber tire with dedicated lanes, enhanced amenities, stand alone stations, level boarding and significantly reduced travel times while utilizing dedicated branded BRT buses. (Launch April 2014)
	Local	Omnitrans		Traditional large bus service operating on a set route with a set schedule at defined frequencies.
	Express	Omnitrans		Freeway bus service using a traditional large bus on a set route with a set schedule and frequency that is designed to connect two or more areas of high concentrated activity. Route(s) typically travel mostly by freeway and stops are placed several miles apart.
	Community Circulator	OmniGo		Smaller bus service designed to offer lifeline mobility for areas with relatively low population and employment density. OmniGo provides service to key locations within Grand Terrace, Chino Hills, and Yucaipa.
Demand Response	ADA Paratransit	Access		Origin-to-destination service provided to comply with the Americans with Disabilities Act (ADA) that is complementary to fixed-route service, and is provided within ¼-mile of a fixed route. Beyond the-boundary Access service extends Access past the ¼-mile fixed route boundary to the edge of each JPA member city, for a nominal fee.
	General Public Dial-a-ride	OmniLink		Origin-to-destination general public lifeline service in Chino Hills and Yucaipa for cities where traditional fixed route service have not historically been efficient due to the intensity of activity and the lack of directness of the road network.

Attachment: City of Chino Appeal Request Form and Supporting Documentation (Appeal of the Draft

## 5.1 sbX

The sbX Program is the first-of-its-kind Bus Rapid Transit (BRT) service to be constructed in the Inland Empire. The sbX Program is designed to provide more frequent and direct transit service along major corridors in the Omnitrans service area.

While Omnitrans' traditional network of local bus services provides good coverage in its general service area, sbX lines provides a "premium" level

of service that is more competitive with the automobile and designed to capture riders who are making medium- to long-distance trips.

By the year 2035, substantial changes are projected for the San Bernardino Valley in the form of population and employment growth, development and travel patterns, all of which will require additional transit service. To address these needs, ten sbX corridors were identified in the Omnitrans' 2004 System-Wide Plan. These are

shown in Exhibit 28.

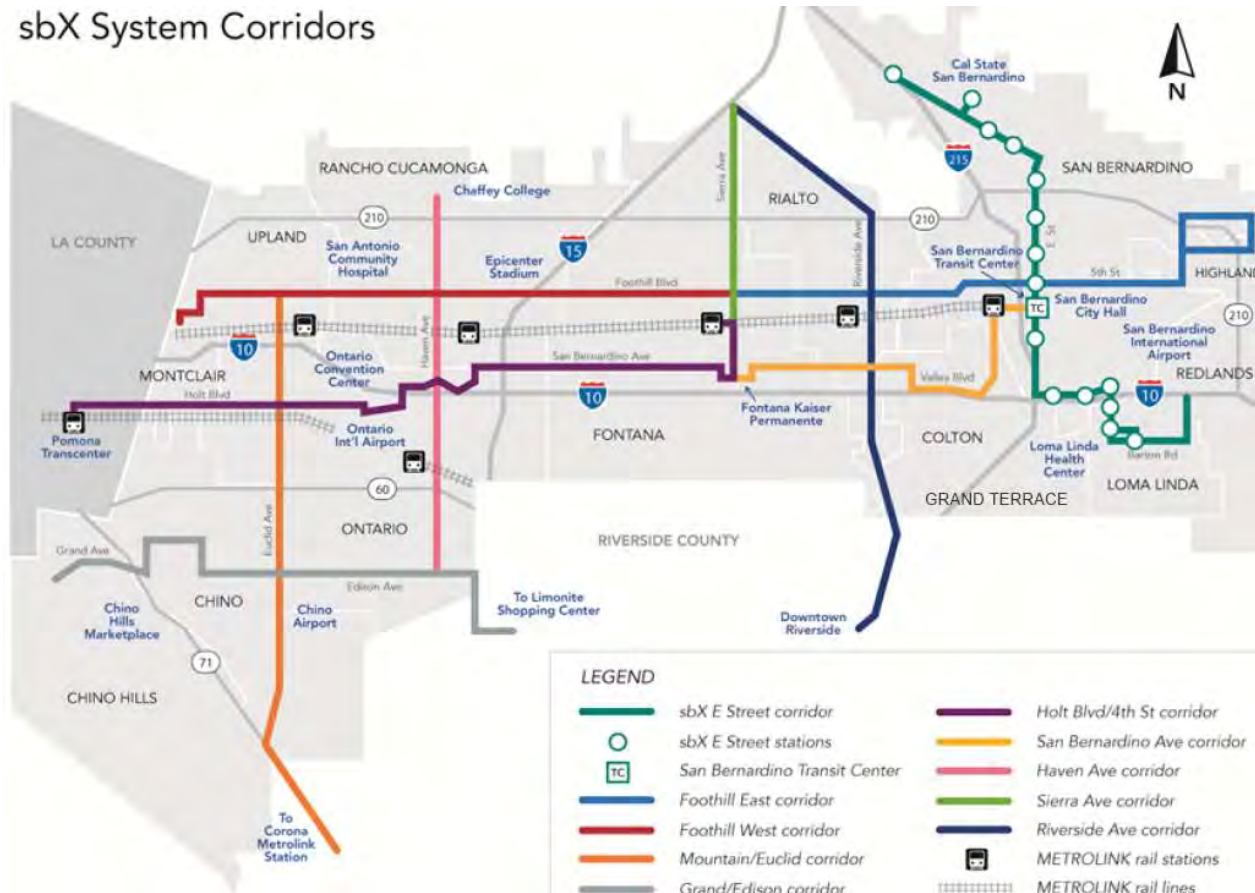
The first sbX corridor to be developed and launched into service is the sbX Green line serving the E Street Corridor in San Bernardino and Loma Linda. The Green Line is shown in Exhibit 29.

Omnitrans' proposed BRT program consists of a variety of components including:

- ▶ **Frequent service** with ten-minute peak and fifteen-minute off-peak frequencies or better while operating at least fourteen hours per weekday;
- ▶ **Limited Stops** with typical stop spacing of between 1/2-mile to 1-mile depending on activity centers in order to improve travel speeds;
- ▶ **Traffic Signal Priority (TSP) and Queue Jump Lanes** designed to minimize wait time at signals and improve travel time;
- ▶ **Dedicated transit stations** that combine high-level passenger amenities, technology, off-board fare payment, level boardings and unique brand;
- ▶ **Dedicated Right-of-Way** where possible and where traffic conditions dictate in order to achieve faster travel speeds;
- ▶ **Branded Vehicles** that clearly identify the vehicle as an express BRT bus, with advance amenities like level boardings, all-door boarding, Wi-Fi on board, and precision docking;

Exhibit 28: sbX Planned System Corridors

### sbX System Corridors



- **Dedicated Corridor Capital Investments** including: park-and-ride lots; real-time bus arrival and departure signage; and Intelligent Transportation System (ITS) technology.

The sbX Green line begins revenue service in April 2014. It is expected to carry 1.4 million passengers per year.

The corridor is 15.7 miles long stretching from Kendall Drive and Palm Avenue in the north, about 1-mile north of California State University, San Bernardino to the Jerry L. Pettis Veterans Affairs (VA) Hospital in the south.

Of the 15.7 mile Green Line, 5.6 miles are on dedicated center-running bus lanes and the remaining 10.1 miles are side-running mixed flow lanes.

The sbX Green line has 23 platforms at 16 locations. The platforms have ticket vending machines, NexTrip bus arrival signs, station Wi-Fi, blue emergency phones, customer service phones, public art and many other advanced features.

As of the writing of OmniConnects, sbX is weeks away from opening. After the start of service, detailed quarterly reports of its performance will be provided, as stated in the sbX Operations and Management Plan.

Exhibit 29 – sbX Green line



## 5.2 Fixed Route

Currently Omnitrans operates 32 fixed routes that include the following types:

- ▶ **Express routes:** These routes use traditional large passenger buses that utilize the freeway system to connect communities to regional areas of highly concentrated activity. Limited stops are placed several miles apart which allow for faster service.
- ▶ **Local routes:** These routes use traditional large passenger buses and operate on a set route and frequency. They serve as the feeder service and are designed to accommodate shorter community trips throughout Omnitrans' service area. As such, bus stop placing is approximately every 0.2 miles, where curb and gutter improvements permit.
- ▶ **OmniGo:** These routes use smaller buses to provide lifeline service in communities that have minimal transit activity and low population and employment density. Omnitrans currently provides OmniGo services in Grand Terrace, Chino Hills and Yucaipa.

Fixed Route service characteristics are defined by three key elements.

- ▶ **Route map**, which shows the destinations and travel path for each route (Exhibit 30).
- ▶ **Span of service**, which shows the hours the route operates (see Exhibit 32).
- ▶ **Frequency or headway** measures how often the bus comes. The frequency measures how

often a bus comes per hour, and a headway is the number of minutes between buses in the same direction. A route with a short headway has a high frequency. See Exhibit 31 for the headways of Omnitrans' routes.

### 5.2.1 Express

Omnitrans currently offers one freeway express route. This is Route 215, which connects Downtown San Bernardino to Downtown Riverside with one intermediary stop in Colton.

Route 215 has been one of Omnitrans' fastest growing routes over the last five years when it took its current form. Since FY2008, Route 215 ridership has grown 58% in total and at a compound annualized growth rate of 9.6%. This is six and half times faster than Omnitrans overall fixed route growth over the same time, which saw total growth of 8.9% and annualized growth of 1.7%.

This faster growth in Express service is particularly notable because Omnitrans had reduced weekend service in FY2010, due to budget limitations. It is now necessary to reconsider this reduction in OmniConnects, because Saturday and Sunday Route 215 service are Omnitrans' most productive route/day combination with nearly 40 passengers per hour and a fare box recovery rate of 30%, well above the average fare box recovery rate of 20% for weekend fixed routes.

Regionally, express service has been performing well. Specifically, Riverside Transit Agency has posted several record high ridership months, and much of this is attributed to their Commuter Express Routes. RTA's Commuter Express Routes

operate similarly to Omnitrans Route 215 express as freeway routes designed to connect major destinations or transfer hubs, with only a few intermediary stops. Unlike Omnitrans' Route 215, RTA's Commuter Express routes focus only on peak AM/PM periods instead of all day service.

During 2013, Omnitrans' express service (Route 215) accounted for 2.2% of all ridership, 1.4% of revenue hours (11,313.5 out of 798,073.5), and 1.8% of operating costs (\$1.2 million out of \$69.3 million).

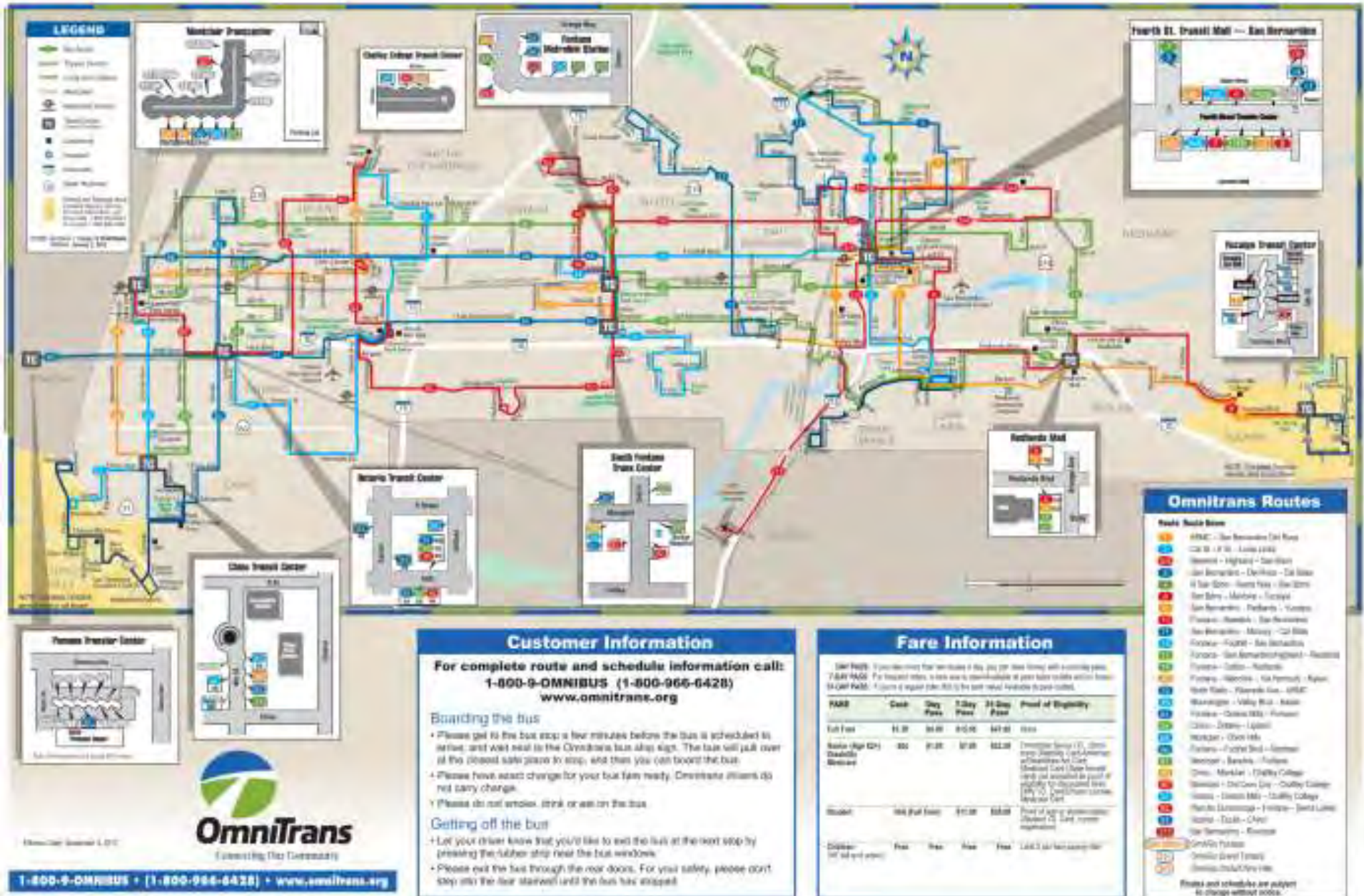
### 5.2.2 Local Routes

Local fixed route services are operated using traditional large buses out of two facilities: the main Omnitrans facility ("East Valley") located at 1700 West Fifth Street in San Bernardino, and the "West Valley" facility located at 4748 Arrow Highway in Montclair. Both facilities support the operation of the services, which include a maintenance facility, fueling stations, and dispatching facilities.

Omnitrans' current weekday span of fixed route service is from 3:48 A.M. until 11:13 P.M. but varies by route as seen in Exhibit 32 – FY 2014 Fixed Route Service Span.

Omnitrans' current frequency can be seen in Exhibit 31 – FY2014 Fixed Route Service Frequency. High frequency local routes operate every 15 to 20 minutes, and less frequent more coverage-oriented services operate between every 30 and 70 minutes.

Exhibit 30 – FY 2014 Fixed Route Service Map



**Exhibit 31 – FY2014 Fixed Route Service Frequency**

Rt	Route Name	FY2014 Headways		
		Weekday	Saturday	Sunday
<b>Fixed Route EAST VALLEY</b>				
1	ARMC-San Bernardino-Del Rosa	15/30	30	30
2	Cal State-E Street-Loma Linda	15/30	20	20/30
3	Baseline-Highland-San Bernardino	15/20	20	20
4	Baseline-Highland-San Bernardino	15/20	20	20
5	San Bernardino-Del Rosa-Cal State	30/35	60	60
7	N. San Bernardino-Sierra Way-San Bernardino	30/60	60	60
8	San Bernardino-Mentone-Yucaipa	60	60	120
9	San Bernardino-Redlands-Yucaipa	60	60	120
10	Fontana-Baseline-San Bernardino	30/60	60	60
11	San Bernardino-Muscoy-Cal State	60	60	60
14	Fontana-Foothill-San Bernardino	15	15/30	15
15	Fontana-San Bndo/Highland-Redlands	30	60	60
19	Redlands-Colton-Fontana	30	60	60
20	Fontana Metrolink-Via Hemlock-Kaiser	30	60	60
22	North Rialto-Riverside Ave-ARMC	30	60	60
29	Bloomington-Valley Blvd-Kaiser	60	60	n/a
215	San Bernardino-Riverside	30	60	60
308	OmniGo Yucaipa	30/60	30	60
309	OmniGo Yucaipa	30	60	60
310	OmniGo Yucaipa	30/60	n/a	n/a
325	OmniGo Grand Terrace	70	70	70
sbX	Green Line	10/15	n/a	n/a
<b>Fixed Route WEST VALLEY</b>				
61	Fontana-Ontario Mills-Pomona	15	15	15
63	Chino-Ontario-Upland	60	60	60
65	Montclair-Chino Hills	60	60	60
66	Fontana-Foothill-Montclair	15/30	30	30
67	Montclair-Baseline-Fontana	60	n/a	n/a
68	Chino-Montclair-Chaffey College	20	60	n/a
80	Montclair-Ontario Conv Ctr-Chaffey College	60	60	60
81	Ontario-Ontario Mills-Chaffey College	60	n/a	n/a
82	Rancho Cucamonga-Fontana-Sierra Lakes	60	60	60
83	Upland-Euclid-Chino	60	60	60
365	OmniGo Chino Hills	60	60	60

In addition, Omnitrans operates tripper service on some routes in order to meet ridership demand that occurs at specific locations at certain times of day. For example, school trippers are routes that

deviate to serve schools only at morning and afternoon bell times when schools are in session.

**Exhibit 32 – FY 2014 Fixed Route Service Span**

Rt	Route Name	FY2014 Service Hours		
		Weekday	Saturday	Sunday
<b>Fixed Route EAST VALLEY</b>				
1	ARMC-San Bernardino-Del Rosa	4:50-22:49	6:07-21:00	6:07-19:40
2	Cal State-E Street-Loma Linda	4:30-22:55	6:30-21:24	6:30-19:30
3	Baseline-Highland-San Bernardino	4:36-23:13	6:04-20:54	6:09-19:15
4	Baseline-Highland-San Bernardino	4:32-22:56	6:22-20:54	6:14-19:24
5	San Bernardino-Del Rosa-Cal State	4:51-22:23	6:48-21:34	6:33-19:34
7	N. San Bernardino-Sierra Way-San Bernardino	6:13-19:52	7:16-18:48	8:08-17:58
8	San Bernardino-Mentone-Yucaipa	4:50-21:17	6:43-19:22	8:05-19:00
9	San Bernardino-Redlands-Yucaipa	5:29-22:03	5:13-22:01	7:05-18:43
10	Fontana-Baseline-San Bernardino	5:10-20:18	6:20-19:25	7:20-18:18
11	San Bernardino-Muscoy-Cal State	5:28-22:17	6:50-18:44	7:17-19:22
14	Fontana-Foothill-San Bernardino	3:48-23:09	6:05-22:28	6:05-19:24
15	Fontana-San Bndo/Highland-Redlands	5:15-22:39	7:14-19:32	6:37-19:32
19	Redlands-Colton-Fontana	4:50-22:30	5:58-19:35	6:15-19:00
20	Fontana Metrolink-Via Hemlock-Kaiser	4:51-21:41	6:26-18:26	6:56-17:56
22	North Rialto-Riverside Ave-ARMC	5:00-22:23	7:35-18:59	6:35-19:35
29	Bloomington-Valley Blvd-Kaiser	6:45-18:35	7:45-18:35	n/a
215	San Bernardino-Riverside	5:05-22:00	6:35-22:00	7:05-19:00
308	OmniGo Yucaipa	6:11-19:25	7:00-20:25	8:00-18:25
309	OmniGo Yucaipa	6:14-20:55	7:00-20:25	7:30-18:39
310	OmniGo Yucaipa	6:00-19:54	n/a	n/a
325	OmniGo Grand Terrace	5:08-20:22	7:17-18:14	8:27-18:14
sbX	Green Line	6:00-20:00	n/a	n/a
<b>Fixed Route WEST VALLEY</b>				
61	Fontana-Ontario Mills-Pomona	4:20-23:08	5:55-22:34	6:05-19:49
63	Chino-Ontario-Upland	5:45-20:36	6:43-18:41	6:38-19:26
65	Montclair-Chino Hills	4:36-22:34	6:40-19:30	6:40-19:30
66	Fontana-Foothill-Montclair	4:19-23:12	5:46-22:15	5:51-19:29
67	Montclair-Baseline-Fontana	5:37-20:22	n/a	n/a
68	Chino-Montclair-Chaffey College	4:40-23:01	6:05-19:25	n/a
80	Montclair-Ontario Conv Ctr-Chaffey College	4:33-21:24	6:30-19:40	6:30-19:40
81	Ontario-Ontario Mills-Chaffey College	4:12-22:20	n/a	n/a
82	Rancho Cucamonga-Fontana-Sierra Lakes	4:35-22:00	6:14-19:10	6:14-19:10
83	Upland-Euclid-Chino	5:49-21:44	5:51-20:36	5:51-19:37
365	OmniGo Chino Hills	4:59-22:09	6:04-18:59	6:05-17:59

Fixed routes are grouped into four tiers reflecting weekday frequency:

deviate to serve schools only at morning and afternoon bell times when schools are in session.



- ▶ **Tier 1 routes** operate on a 15 minute or better headway;
- ▶ **Tier 2 routes** operate on a 16 to 20 minute peak headway;
- ▶ **Tier 3 routes** on a 21-40 minute headway, typically operating at a 30 minute headway; and,
- ▶ **Tier 4 routes** operate at 41 minute or greater headway, typically operating at a 60 minute headway.

Tier 1 and Tier 2 local routes, combined with express and BRT corridors, including the local route that share the BRT corridor, are considered Omnitrans’ productivity-oriented services. Tier 3 and Tier 4 local routes, combined with OmniGo and OmniLink, are Omnitrans’ coverage-oriented services.

Productivity-oriented services are designed to effectively and efficiently transport the greatest number of people. These routes should have more passenger amenities and strive to find significant travel time savings in order to positively impact the greatest number of riders.

Coverage-oriented service is designed as life-line service to ensure that the community has access to transit and that the majority of residents have some level of transit availability.

Increasing the frequency of a route tends to generate additional ridership because it reduces transfer and wait times, thereby reducing the customer’s total trip time from origin to destination. Omnitrans’ productivity-oriented

routes (Tier 1, Tier 2, express, and BRT routes) carry an average of 30.3 passengers per hour, while coverage-oriented routes (Tier 3, Tier 4, OmniGo, and OmniLink) carry an average of 21.2 passengers per hour.

Omnitrans’ routes 1, 3/4, and 14 have the highest passengers per hour on weekdays and Route 215 has the highest on weekends. See Exhibit 36. The passengers per hour data also illustrate the relative performance of routes and can be used later for a reevaluation of resource allocation between the routes.

Local fixed-route bus service accounts for the vast majority of Omnitrans’ service, accounting for 93.9% of Omnitrans’ 16.1 million trips, 72% of Omnitrans’ 798,073 revenue hours, and 77.4% of Omnitrans’ \$69.3 million operating budget.

### 5.2.3 OmniGo Service

Omnitrans’ OmniGo services are community circulators that function like a fixed-route service but utilize smaller vehicles that are more effective in areas with local roads and lower passenger demand.

The OmniGo program was designed to augment OmniLink demand-response service by providing higher productivity and efficiency along routes connecting community destinations.

In Yucaipa, Grand Terrace and Chino Hills, the OmniGo circulators were designed to provide transportation to the areas that previously had seen the highest OmniLink usage while ensuring

integration and easy transferability to the main Omnitrans local route network. The result was a community circulator system that provided Omnitrans and Omnitrans’ riders with a cost effective way to connect passengers to the broader Omnitrans fixed-route network.

OmniGo routes operate between every 30 to 70 minutes depending on route with a span of service ranging from 4:59 A.M. until 10:09 P.M. on weekdays.

OmniGo is a relatively small share of Omnitrans service offerings, despite delivering strong results for areas that do not support larger local bus service. OmniGo provides 0.9% of Omnitrans Systemwide ridership, accounts for 3.5% of the system’s revenue hours and 2.7% of system-wide operating costs.

### 5.3 Fixed Route Performance Stats

Detailed route performance statistics can be found in several of the appendices to this report. The Comprehensive Operational Analysis (COA) of Omnitrans includes detailed route characteristics and evaluates those characteristics compared to other standards.

The Origin, Boarding, Alighting and Destination

**Exhibit 33: Share of Ridership, Revenue Hours and Operating Costs for each Family of Service**

Service	Ridership	Revenue Hours	Operating Costs
Local Bus	93.9%	72.3%	77.4%
Express Bus	2.2%	1.4%	1.8%
OmniGo	0.9%	3.5%	2.7%
OmniLink	0.1%	0.8%	0.6%
Access	2.9%	22.0%	17.5%
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

(OBAD) analysis provides an update of key service characteristics on weekdays and weekends and route-level travel patterns developed from a 7,000 rider survey.

The Route Profiles Appendix describes each route, its performance, and key areas served along each route.

This section provides a high-level overview of the Route Profiles by highlighting three key statistics by route:

- ▶ **Ridership:** the raw general measure of how many boardings occur by route that has not been adjusted by how much service is being delivered.
- ▶ **Passengers per Hour:** the main measure of a route's productivity that measures the effectiveness of a service. At the detailed route and day level, passengers per hour can be a more accurate measure of performance than farebox recovery ratio because it is not adjusted by revenue or cost allocations.
- ▶ **On-Time Performance:** the main measure of the reliability of a route. A route is considered on-time if it departs between zero to five

minutes after the scheduled departure time of the route.

In evaluating a route's performance, Omnitrans divides routes into tiers as defined in Section 5.2.2 Local Routes on the previous page. Tiers subdivide routes by the frequency of service so that the higher the tier (with Tier 1 being the highest), the more frequently the service is offered. OmniGo is in its own tier; it differs from the other tiers because 1) it is offered through a contractor; and, 2) it uses smaller 16-passenger cutaway vans instead of traditional 40-passenger buses.

### 5.3.1 Ridership

Ridersh

ip is the basic performance statistic; however, it shows only scale of activity, not necessarily how well the route performed compared to other routes.

Route 61 is the highest ridership route, primarily serving the Holt and San Bernardino Avenues corridor between Fontana, Ontario and connecting into Pomona. The OmniGo routes offer the smallest amount of annual ridership ranging from approximately 50,000 boardings annually on 365 to 4,500 on Route 310. Route ridership levels can be seen in Exhibit 34

Exhibit 34: Omnitrans' Annual Fixed Route Ridership by Tier and Route

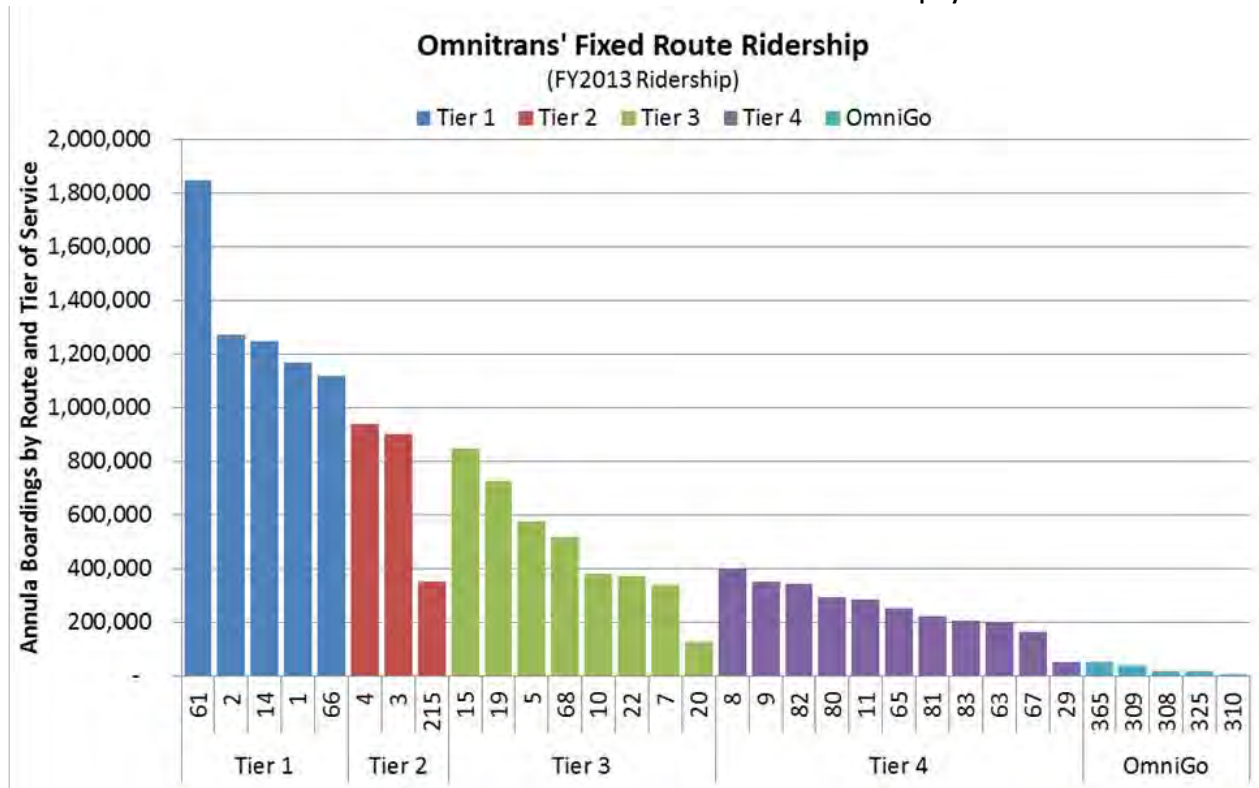


Exhibit 35 provides historical context for Omnitrans' ridership by looking at two decades of system-wide ridership trends.

The period of 1993 through 2002 was characterized by high ridership growth. During that period Omnitrans' system-wide total ridership increased from 6.5 million to 17.1 million; a total increase of 162% or a compounded annualized increase of 11.3%.

This period of high growth occurred as Omnitrans refined its fixed route system and developed a fare

structure based on multi-use passes instead of cash fares and transfers. This growth coincided with population growth in the Inland Empire.

The period 2002-2005 was characterized by a decline in ridership from the high of 17.1 million passenger boardings to 15.5 million boardings.

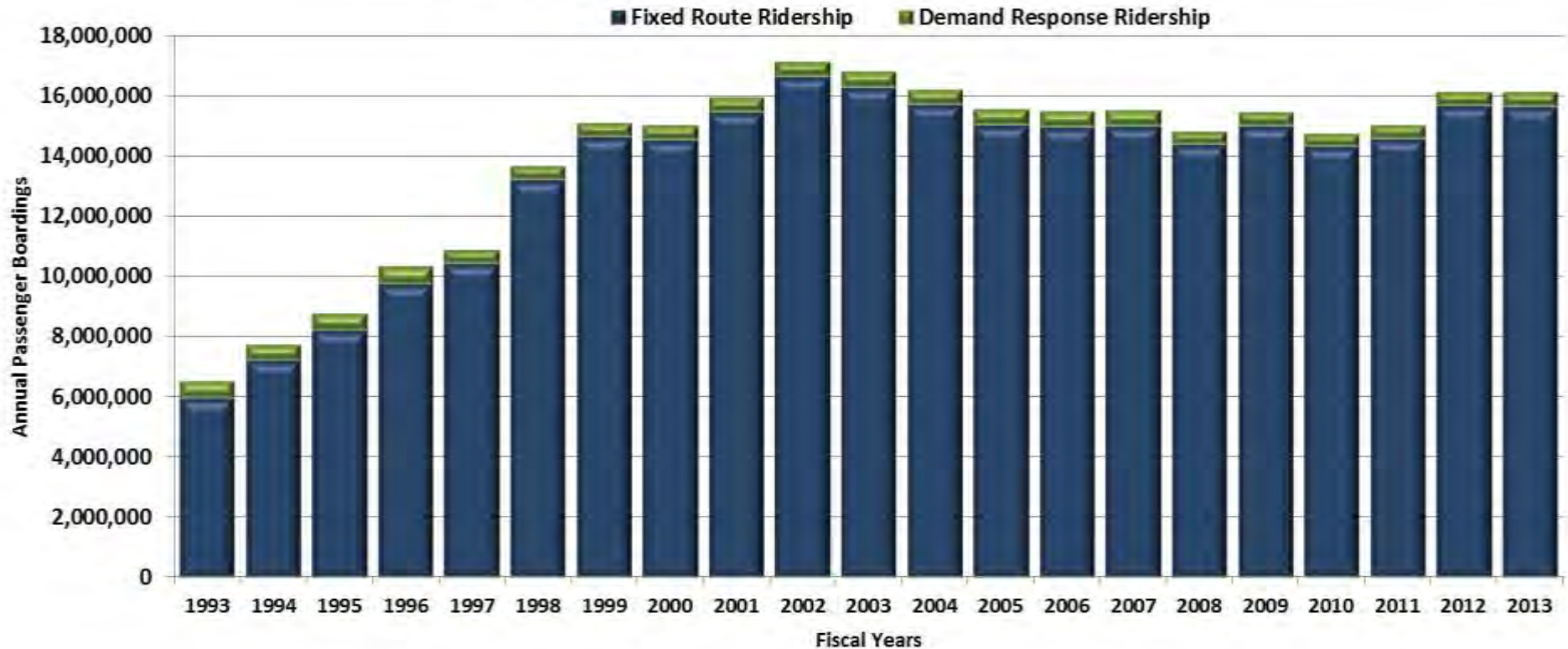
The period 2005-2010 saw slight declines associated with two budget driven service reductions and fare increases.

Since 2010, Omnitrans has seen growth tied to growing senior and student ridership couple with growth from OmniGo and Express bus service.

Moving forward Omnitrans strives to recapture some of the growth trend established in the 1990s by focusing on developing higher-quality service like sbX and using technology to improve information and fare payment designed to again coincide with an expected period of population growth for the Inland Empire.

Exhibit 35: Omnitrans System-wide Ridership by Mode for Fiscal Years 1993 to 2013

## Omnitrans' System-wide Ridership by Mode



## 5.3.2 Passengers per Hour

Adjusting a route's ridership by the amount of hours of service delivered provides a more accurate measure of productivity.

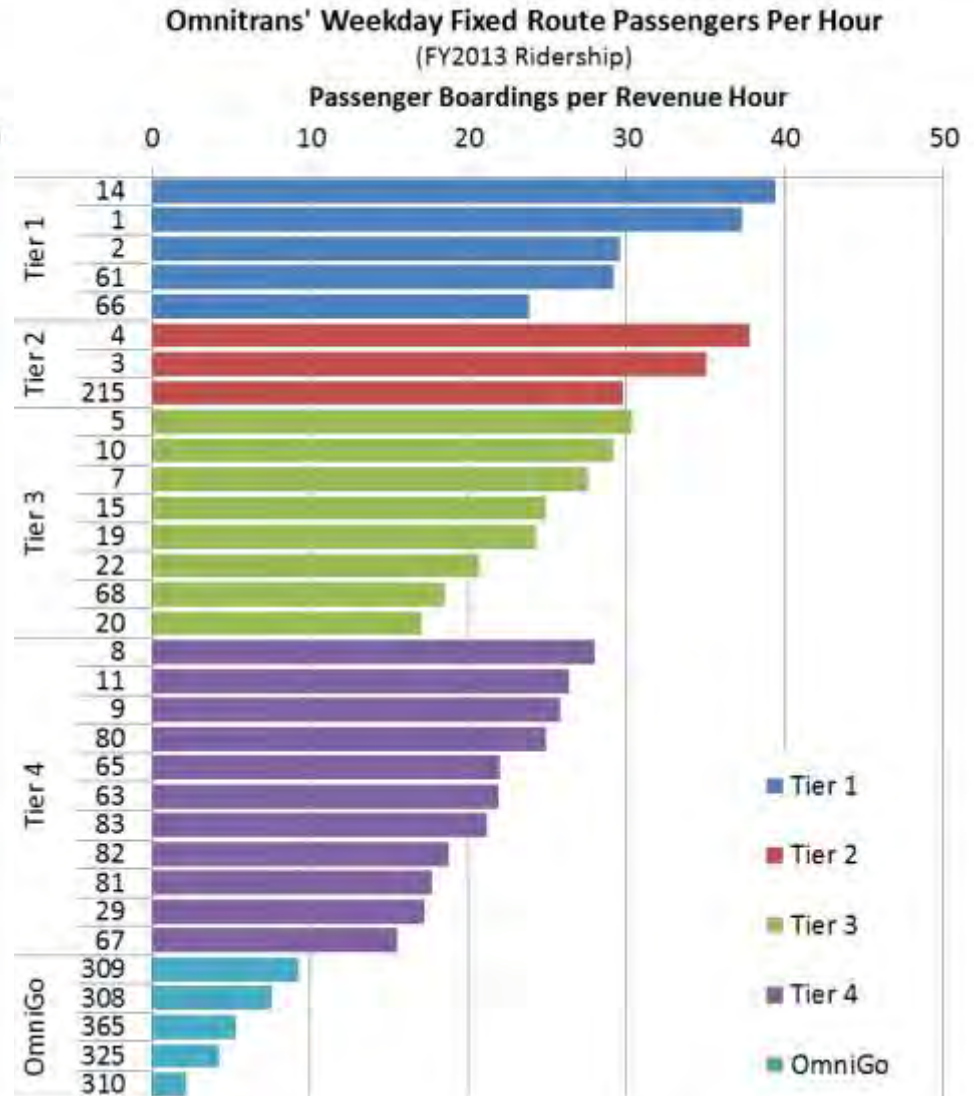
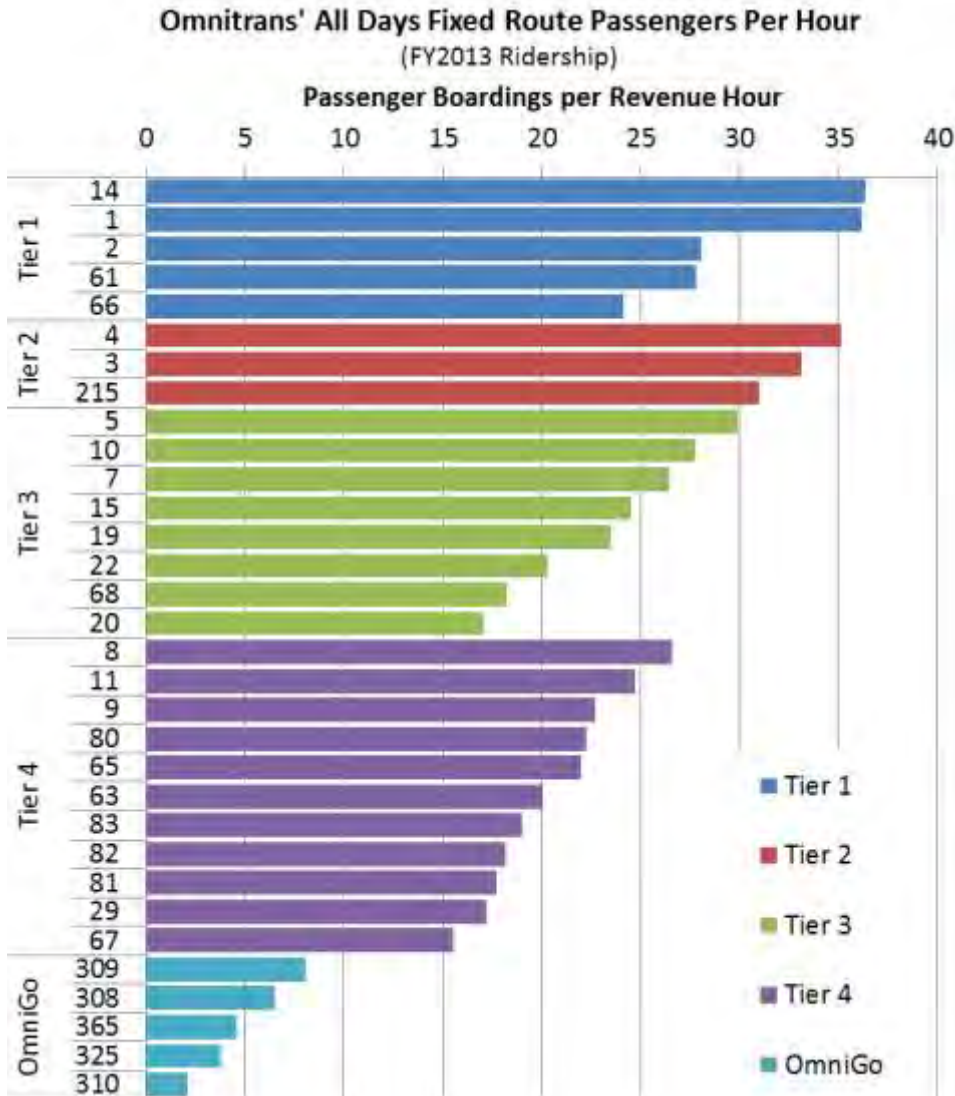
The data provided in Exhibit 36 and Exhibit 37 illustrates the productivity of each of Omnitrans' routes by tiers as defined in Section 5.2.2 Local Routes. The higher the productivity, the better the route performs. The higher the productivity of the

route, compared to the next tier higher, the more likely that route is to warrant additional resources.

Conversely, the lower the productivity, particularly compared to the next lower tier, the more likely

Exhibit 36: Fixed Route Passengers per Hour (All Days)

Exhibit 37: Fixed Route Passengers per Hour (Weekday)



the route is to warrant a reduction in resources (i.e., frequency, span of service, or days of operation).

For example, routes 3 and 4, both Tier 2 routes,

exceed the productivity of the majority of Tier 1 routes and as a result should be evaluated for additional resources. Similarly, Routes 8, 9, 11, and 80 are higher-performing Tier 4 routes that may warrant additional resources (i.e., higher

frequency, longer service span, peak service offerings or similar).

Evaluating the Saturday and Sunday data, show one route in particular, Route 215, that greatly

Exhibit 39: Fixed Route Passengers per Hour (Saturdays)

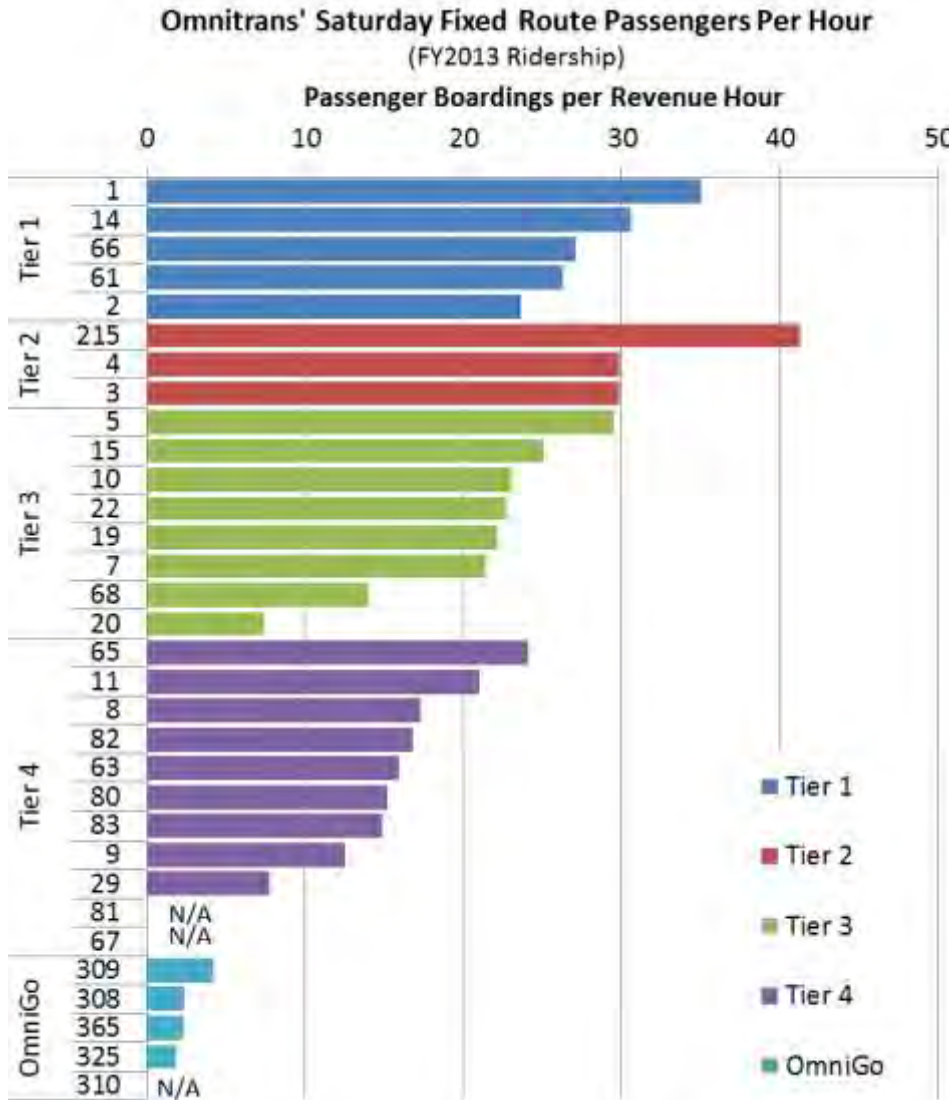
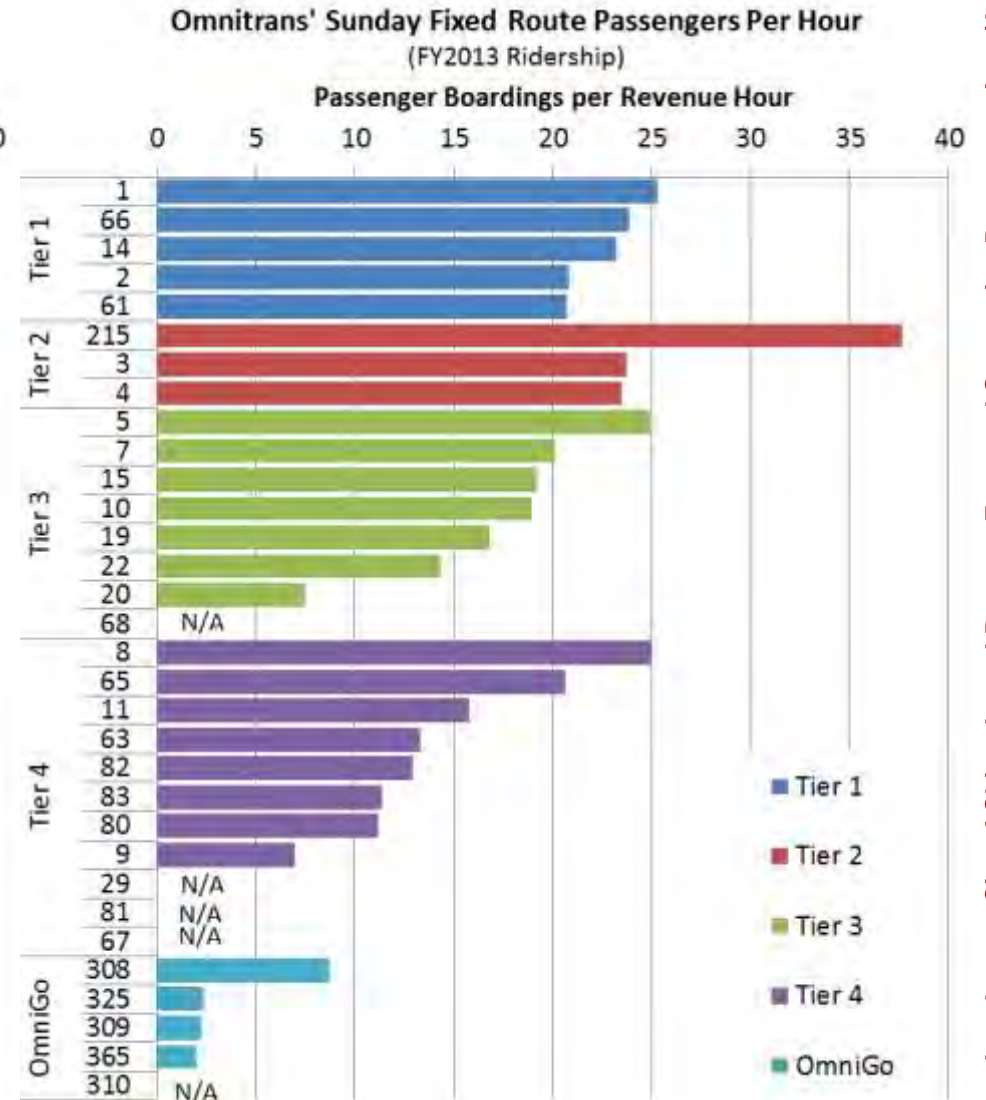


Exhibit 38: Fixed Route Passengers per Hour (Sunday)



exceeds the productivity of all other routes. While Route 215 is operating as a Tier 2 route during the weekday, its 60-minute weekend frequency should be enhanced based on the findings here. The performance of Route 215 is also noteworthy because it follows the regional trend towards the importance of express service.

On Saturday and Sunday, several routes have “n/a,” which indicates that the route is not in service on those days.

**5.3.3 On-Time Performance**

On-time performance is the primary measure of a route’s reliability. Like passengers per hour, higher numbers are better. Unlike passengers per hour, the lower the on-time performance, the more likely the route is to need additional resources.

Routes 3 and 4 have the lowest on-time performance (near 80%) of the higher-tier routes. Routes 3 and 4 were also amongst the highest passenger-per-hour routes. Omnitrans has worked to resolve on-time performance issues on Routes 3 and 4 with small tweaks, but the routes continue

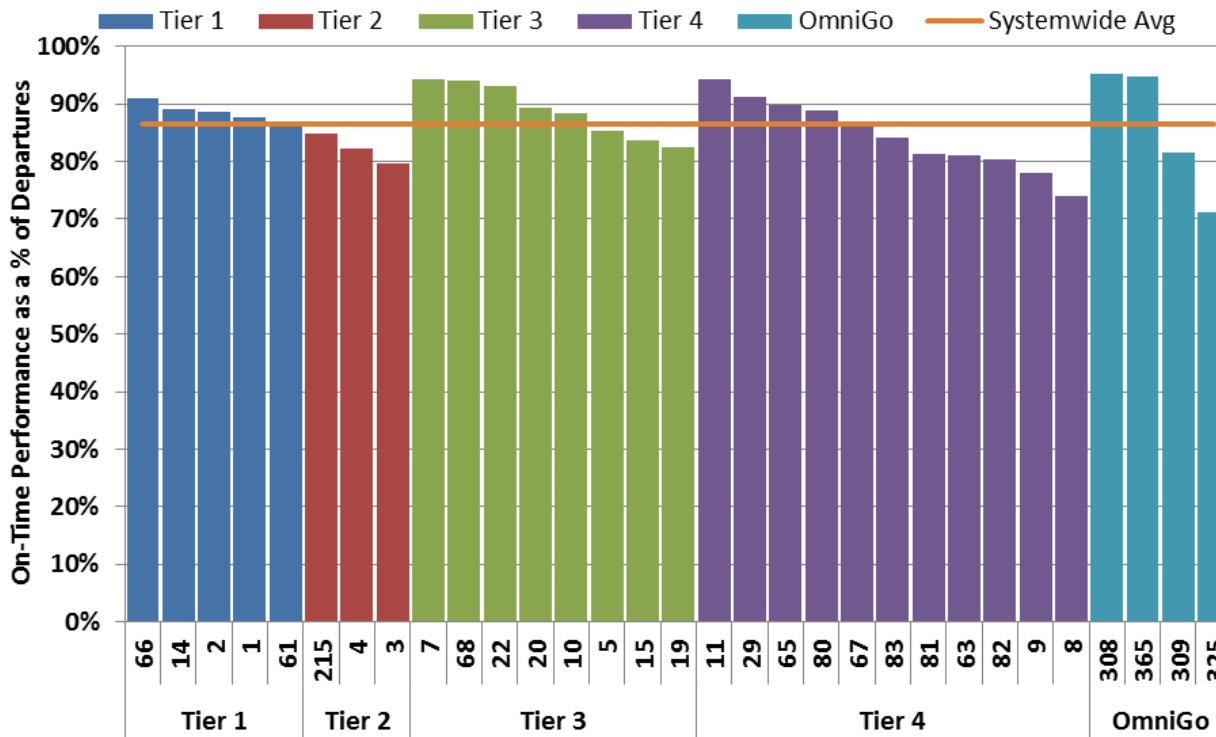
to underperform on on-time performance. The remaining options to improve on-time performance revolve around either adding resources or reducing frequency. Given the overall success of the Routes 3 and 4, additional resources to more evenly load the routes for better on-time performance and to build upon the higher passengers per hour is warranted.

Similarly, routes 19, 8 and 9 have a reliability score below the system-wide average and well below their Tier peers. As a result, resources should be allocated or routes redesigned to improve the reliability while also working to build upon reasonable productivity.

The route with the lowest on-time performance is OmniGo Route 325 at just over 70% on-time. While this low number indicates a problem, a detailed analysis of the route shows that it suffers from an isolated issue that is improving service rather than a reliability issue that degrades service. At one time-point the route departs approximately 20% early. This time point is the Grand Terrace Senior Center, where the time point is at the curb outside of the parking lot for the senior center. The bus departs early because it drops of and picks up the seniors in the senior center parking lot that it uses as a turn-around, thus giving better service to the seniors. Unfortunately this counts against the performance of the route because Omnitrans timepoints and official stops are street-side not on private property.

Exhibit 40: Fixed Route On-Time Performance by Route (All Days)

**Omnitrans' Fixed Route On-Time Performance**  
(FY2014 YTD, through December)



## 5.4 Demand Response

Omnitrans currently provides two forms of demand-response service operated by a subcontractor: OmniLink and Access. Both services provide origin-to-destination service and require customers to make trip reservations in advance of their trip.

Unlike fixed-route service, demand-response service does not operate on a specific route map or at a specific frequency. Rather, it is a shared-ride service that attempts to maximize efficiency while maintaining reasonable passenger travel times for riders.

### 5.4.1 OmniLink

OmniLink is an origin-to-destination general public demand-response service designed for low-density areas. The service currently operates within the city boundaries of Chino Hills and Yucaipa where traditional fixed-route service has not historically been efficient due to the low density of land uses and the lack of direct road network found in these areas.

The service is designed to provide feeder service to/from Omnitrans' fixed route bus service. Riders using the service are required to book the trips in advance up to three days. In both Chino Hills and Yucaipa, service is provided Monday to Friday, 7:00 A.M. to 6:00 P.M.

OmniLink is Omnitrans' smallest service in the family of services in terms of ridership and revenue hours. OmniLink accounts for 0.1% of Omnitrans' system wide ridership

at just 18,547 trips compared to Omnitrans' total of 16.1 million. OmniLink accounts for 0.8% of Omnitrans revenue hours and 0.6% of Omnitrans annual operating budget.

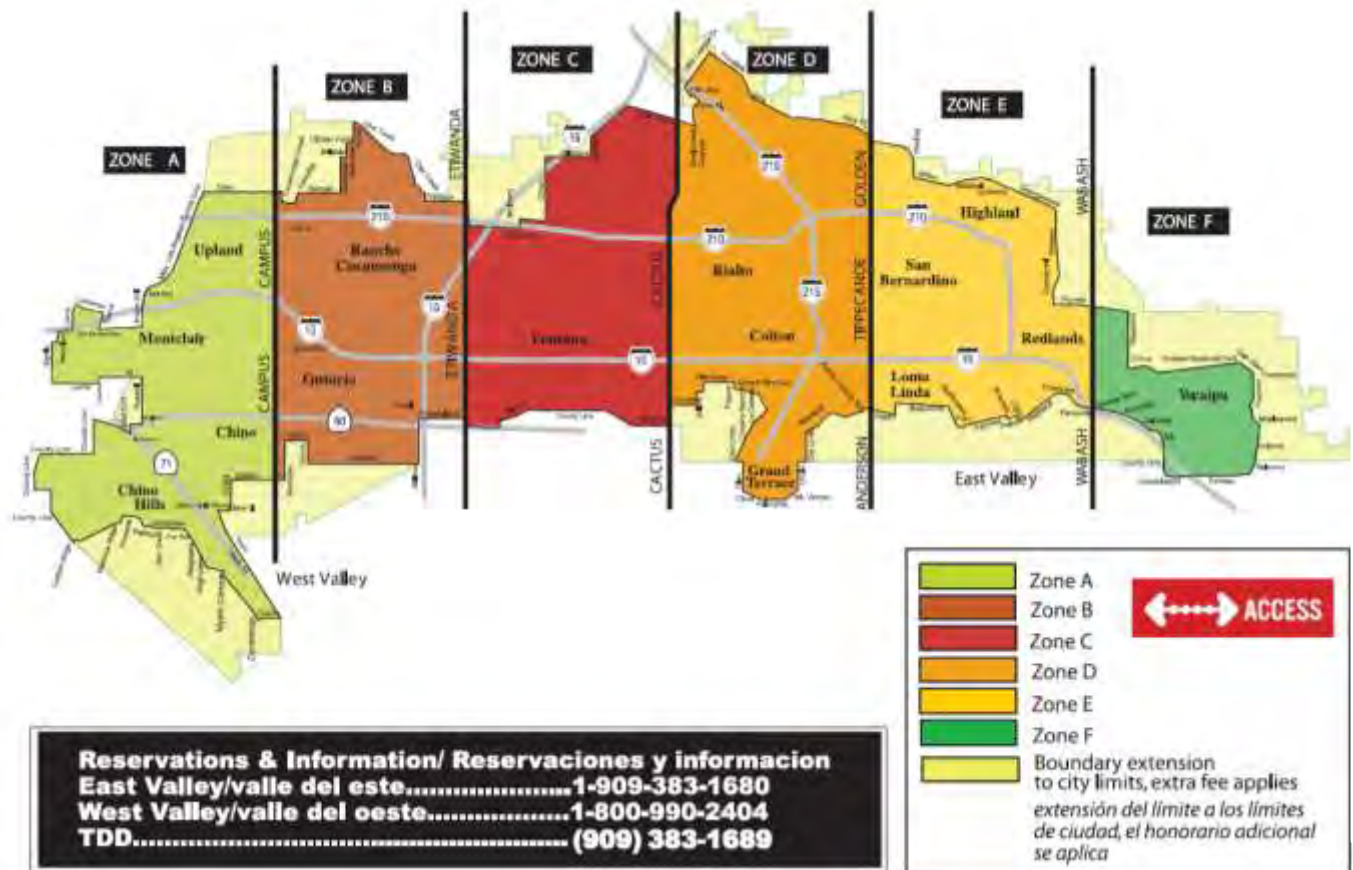
The OmniGo routes added in FY2011 overlap much of OmniLink's service area. Currently, the origins and destinations of 85.5% of OmniLink trips in Yucaipa and 60.4% in Chino Hills are within ½-mile walking distance of an OmniGo stop.

### 5.4.2 Access

The American with Disabilities Act (ADA) require that fixed route transit operators provide, or ensure the provision of, "complementary paratransit service for those individuals who because of their disability, cannot use the regular general public fixed route service."

Access service is Omnitrans' ADA complementary paratransit service for eligible persons who are physically or cognitively unable to use regular fixed route transit. Access provides service seven days a week.

Exhibit 41: Access Service Area and Zone Map (Effective FY2014)



week and requires eligible riders to book each trip in advance. A map of the Access service area can be seen in Exhibit 41.

Access service is available throughout the Omnitrans service area within a ¾-mile radius of either side of an existing Omnitrans regular fixed bus route.

Beyond-the-ADA-boundary Access service extends past the 3/4-mile boundary required by ADA, to the edge of each JPA member city for a nominal fee. Beyond-the-ADA-boundary Access service is available Monday through Friday from 9:00 am to 8:00 pm, and Saturday and Sunday from 7:00 a.m. to 7:00 p.m.

Access services consume a large share of Omnitrans' operating budget compared to the ridership generated. Access ridership is only 2.9% of Omnitrans' 16.1 million trips annually; however, the costs to run access account for 17.5% of Omnitrans' total budget. This is largely due to the individualized and regulated nature of the ADA trips provided.

In order to minimize the overall costs of Access trips, Omnitrans has partnered with VTrans and SANBAG to provide pass-through of FTA Job-Access Reverse Commute (JARC, FTA §5316) and New Freedom (FTA §5317) funding to several community groups. The purpose of Omnitrans' involvement is to help the community groups replace travel on Access with other services.

Since the majority of Access trips are to or from large workshops served by these community

groups, partnering with these groups will help reduce Access ridership and associated costs.

Over time, Omnitrans must seek other partnering opportunities in order to minimize the cost of providing Access service. One key area where Omnitrans and VTrans can partner is the development of in-person functional assessments.

Functional assessments work to ensure that riders using Access are truly qualified for Access. While Omnitrans has a fairly detailed paper screening process, it is still a paper screening process.

The use of functional assessments could allow a better referral process from Omnitrans to VTrans' travel training program. Additionally, the functional assessments can open up additional opportunities to incentivize transition from Access to fixed-route, where the per passenger cost falls from approximately \$26 per passenger to \$4 per passenger.



## 6 OUR PARTNERS

As the service provider and FTA designated recipient of federal funds within the San Bernardino Valley, Omnitrans works in partnership with neighboring transit agencies and federal, state, and local funding agencies. Omnitrans has active cooperative service agreements and grant agreements with the agencies identified in this section.

### 6.1 Neighboring Transit Agencies

Omnitrans works collaboratively with surrounding regional transit providers to provide a connected regional network that reaches the destinations where people need to go. Exhibit 42- Fixed Route Network displays Omnitrans' current fixed route network and connectivity to the regional transit providers with a description of each provider detailed below.

#### 6.1.1 Riverside Transit Agency (RTA)

Riverside Transit Agency is the Consolidated Transportation Service Agency for western Riverside County. The agency provides both local and regional bus service including 36 fixed routes, eight CommuterLink routes, and demand response service. RTA routes, 14, 21, 49 and 204 provide transfers into the San Bernardino Valley. The interagency agreement provides that Omnitrans and RTA will accept each other's transfers/passes on fixed routes, valued at each agency's base fare.

- ▶ **RTA Route 14** provides 70-minute headways between Riverside's Galleria at Tyler and Loma Linda's Jerry L. Pettis Veterans Administration Hospital, where it connects to Omnitrans' Routes 2, 9, 19, OmniGo 325, and sbX Green

Line. The route provides a vital connection to a major destination within Omnitrans, service area and operates between 5:15 a.m. to 8:38 pm on weekdays and between 6:54 a.m. to 7:44 p.m. on weekends.

- ▶ **RTA Route 21** provides 60-minute headways between Riverside and Fontana, where it connects to Omnitrans' Route 82. The route operates between 6:18 a.m. to 8:18 p.m. on weekdays and between 8 a.m. to 6:45 p.m. on weekends.
- ▶ **Route 49** provides 70-minute headways between Downtown Riverside and Fontana, where it connects to Omnitrans' Route 82. The route operates between 4:27 a.m. to 8:33 p.m. on weekdays and between 6:00 a.m. to 7:52 p.m. on weekends.
- ▶ **Route 204** is a commuter service that provides 60-minute service between downtown Riverside, Ontario Mills Mall, and the Montclair Transcenter on weekdays only. The route connects to Omnitrans routes 61, 65, 66, 67, 68, 80, 81 and 82. It operates between 4:33 a.m. to 8:11 p.m. on weekdays only.

#### 6.1.2 Victor Valley Transit Authority

Victor Valley Transit Authority (VVTA) provides service in the high deserts of Adelanto, Apple Valley, Hesperia, Victorville and San Bernardino County. The agency provides three types of fixed routes: county routes, local fixed routes, and local deviated routes. In addition, VVTA provides ADA demand response service.

- ▶ **B-V Link** is VVTA's only route that provides a connection from Fort Irwin, Barstow, Victorville and then into Omnitrans' service area on weekdays. The lifeline service operates from 6:00 a.m. to 7:00 p.m. with the last trip departing from the Fontana Transfer Center at 3:40 p.m. The route stops at the following five locations within Omnitrans service area: Fourth Street San Bernardino Transfer Center, San Bernardino Metrolink Depot, Arrowhead Medical Center, Kaiser Hospital Fontana, and the Fontana Transfer Center.

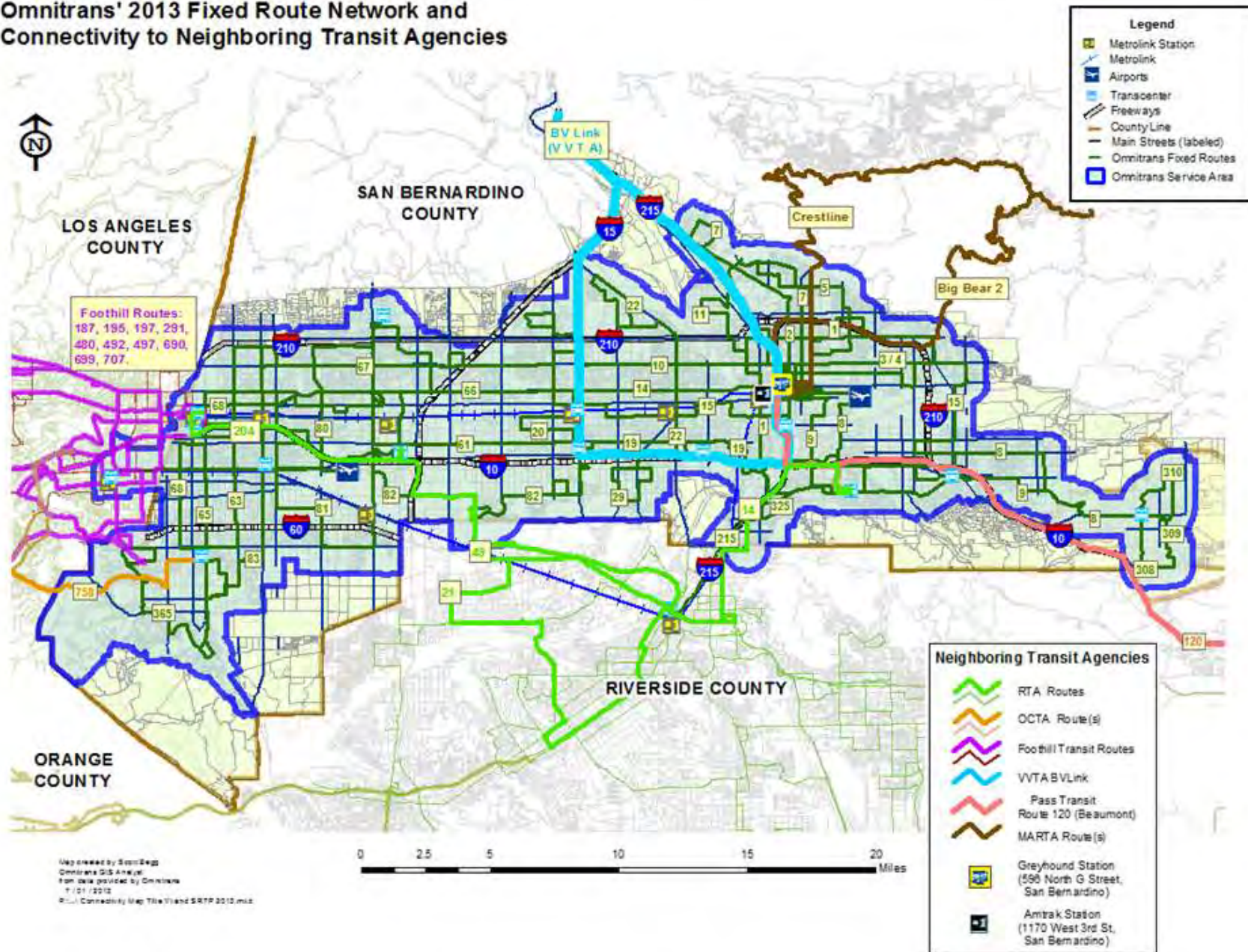
#### 6.1.3 Mountain Area Regional Transit Authority

Mountain Area Regional Transit Authority (Mountain Transit) provides services to Big Bear Valley, Running Springs, Lake Arrowhead, Crestline, and San Bernardino. The agency operates local and ADA demand-response service.

- ▶ **Off-the-Mountain Service** is operated by Mountain Transit Monday through Saturday with stops in Highland and San Bernardino. This service provides a connection to 13 Omnitrans routes at the San Bernardino 4th Street Transfer Center.

Exhibit 42- Fixed Route Network

## OmniTrans' 2013 Fixed Route Network and Connectivity to Neighboring Transit Agencies



## 6.1.4 Orange County Transportation Authority

Orange County Transportation Authority (OCTA) provides service within Orange County and offers a bus system made up of 77 fixed routes. OCTA's Route 758 provides a transfer into Omnitrans' service area. As such, the interagency agreement provides that Omnitrans and OCTA will accept each other's transfers/passes on fixed routes, valued at each agency's base fare.

- ▶ **OCTA Route 758** is a commuter route that provides connections to Omnitrans routes 63, 65, 68, 83, and OmniGo 365. The service operates four trips on weekdays from 4:18 a.m. to 7:37 p.m. The trips provide transfer opportunities for passengers traveling between the City of Irvine and the Chino Transit Center.

## 6.1.5 Pass Transit

Pass Transit is operated by the City of Beaumont and provides service to Beaumont, Banning, Cherry Valley and Cabazon.

- ▶ **Commuter Route 120** connects to Omnitrans' service area by running a shuttle service to the VA Hospital in Loma Linda and to the San Bernardino Metrolink Station. The service runs on weekdays only and does not accept free transfers from Omnitrans.

## 6.1.6 Foothill Transit

Foothill Transit serves the Pomona and San Gabriel Valleys in Los Angeles County, abutting Omnitrans' service area. Foothill offers several routes into Omnitrans' service area with transfers occurring at the Montclair Transit Center and Pomona Transit Center. Agreements between the two agencies allow passengers and employees with easy

transfers between the agencies at points of contact as long as a rider has a valid multi-use pass.

## 6.1.7 Metrolink

Metrolink commuter rail service is operated by the Southern California Regional Rail Authority, which is comprised of five counties including San Bernardino. Metrolink's San Bernardino Line, Inland Empire-Orange County Line, and Riverside Line have eight stations within the Omnitrans service area, with most transfer activity occurring at the Fontana, Montclair, and Downtown Pomona stations. Riders transferring from Metrolink can use the Metrolink fare media on Omnitrans routes: 1, 10, 14, 15, 19, 20, 22, 61, 63, 65, 66, 67, 68, 80, 81, 82, and 83.

## 6.1.8 Greyhound

Greyhound is the largest provider of intercity bus transportation, serving more than 3,800 destinations nationwide. Greyhound's San Bernardino station is located at 596 North G Street. It is serviced by Omnitrans' Route 11 and located less than a quarter of a mile from the San Bernardino 4th Street Transfer Center that provides connections to 13 Omnitrans routes, VVTA's BV Link route, and Mountain Transit's Off-the-Mountain service.

## 6.1.9 Amtrak

Amtrak is the national rail operator for intercity passenger service, serving over 500 destinations in 46 states. Amtrak's Southwest Chief Line stops at the Santa Fe Depot in San Bernardino, which is served by Omnitrans' Route 1. In addition, Amtrak's Sunset Limited and Texas Eagle lines stop at 198 East Emporia Street in Ontario, which is less

than a quarter of a mile walk from Omnitrans routes 61, 63, 80, 82, and 83..

Amtrak's Thruway buses provide feeder service from the Ontario and San Bernardino Amtrak stations to Amtrak's other California routes, as well as provide bus service to tourist destinations such as Las Vegas, Palm Springs/Cabazon, and beach cities.

## 6.2 Federal and State Agencies

Omnitrans also interacts with various federal, state, and local agencies.

### 6.2.1 Federal Transit Administration

The Federal Transit Administration (FTA) is the primary federal entity for public transportation under the United States Department of Transportation (USDOT). The FTA provides financial and technical assistance to local public transit systems. The FTA has review authority over the federal environmental documentations grants, and federally funded projects produced by Omnitrans. As a direct recipient, Omnitrans receives a large portion of programmed funding from the FTA, including pass-through funds awarded to sub-recipients. More information can be found at [www.fta.dot.gov](http://www.fta.dot.gov).

### 6.2.2 California Transportation Commission

The California Transportation Commission (CTC) is the primary decision making body within California for state funding programmed and allocated to Omnitrans for capital projects. The CTC was established in 1978 by Assembly Bill 402 and is the Commission responsible for adopting the State Transit Improvement Program (STIP), which detail

all agency expenditures over the next five years on a biannual basis. Every change that is made to Omnitrans' capital and operating programs must ultimately be approved by the CTC before it can be included in a grant that goes to the FTA. More information can be obtained about the CTC on the state's web site, [www.catc.ca.gov](http://www.catc.ca.gov).

### 6.2.3 Caltrans

The California Department of Transportation (Caltrans) plays a role in implementing the programming and monitoring of some grant funds for transit projects in California. As such, Omnitrans submits reports to Caltrans for state-funded projects. Omnitrans is located within Caltrans District 8. Additional information can be found on Caltrans website [www.dot.ca.gov](http://www.dot.ca.gov).

### 6.2.4 Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the designated Metropolitan Planning Organization overseeing the cities and counties of Imperial, Los Angeles, Orange, Riverside, Ventura, and San Bernardino. SCAG researches and plans transportation, growth management, hazardous waste management, and air quality for the six-county region. SCAG is responsible for adopting the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Transportation projects outlined in the RTP/SCS's long-term vision for multimodal transportation are later programmed in the Federal Transportation Improvement Program (FTIP), the capital listing of all transportation projects proposed over a six-year period. Capital and operating projects must be approved and listed within the FTIP before they

can be included in a grant application to the FTA. Additional information about SCAG and the current RTP/SCS can be found at [www.scag.ca.gov](http://www.scag.ca.gov).

## 6.3 County Agencies

The County of San Bernardino is a member of the Joint Powers Authority of Omnitrans and has representation on Omnitrans' Board of Directors. Omnitrans works with the County as it does with its member cities, as the County is responsible for planning and engineering for its unincorporated areas. In addition, Omnitrans works in close partnership with the County Transportation Commission, the San Bernardino Associated Governments.

### 6.3.1 San Bernardino Associated Governments

The San Bernardino Associated Governments (SANBAG) is the council of governments and transportation planning agency for San Bernardino County. SANBAG is responsible for cooperative regional planning and serves as the County Transportation Commission, which programs funds for bus transportation. As the County Transportation Commission, SANBAG has the responsibility under State law of proposing county projects, using the current RTP's policies, programs, and projects as a guide, from among submittals by cities and local agencies. The locally prioritized lists of projects are forwarded to SCAG for review. From this list, SCAG develops the FTIP based on consistency with the current RTP, inter-county connectivity, financial constraint, and conformity satisfaction. Further information about SANBAG can be found by reviewing their website at [www.sanbag.ca.gov](http://www.sanbag.ca.gov).

## 6.4 Cities

Omnitrans works closely with its JPA member cities and neighboring cities to coordinate planning efforts and projects. Omnitrans staff often reviews cities' transportation project plans and development proposals for coordination with the transit system (for example, bus stop placement and amenities). Cities also frequently include future transit plans in their General Plan updates or require property developers to build transit amenities.

Omnitrans works in partnership with the cities to develop infrastructure improvements, such as bus stop improvements and transit centers or transfer centers. Several cities in Omnitrans' service area are planning transit-oriented development along future bus rapid transit (BRT) routes, in order to help capture the benefit of BRT and to promote high ridership in the areas around the stations.

## 6.5 Consolidated Transportation Service Agency

In October 2010, SANBAG created and designated Valley Transportation Services (VTrans) to be the Consolidated Transportation Service Agency (CTSA) for the San Bernardino Valley. CTSA's were created under auspices of the Social Services Transportation Improvement Act to achieve the intended transportation coordination goals of that Act. VTrans is an eligible recipient of Measure I Senior/Disabled funds collected in the Valley portion of San Bernardino. VTrans has introduced and partnered on various transportation programs focused on improving the mobility for seniors, persons with disabilities and persons of low income.

## 7 FY2015 – FY2020 FINANCIAL PLAN

This chapter lays out Omnitrans’ FY2015-2020 finance plan based on the revenue and cost projections developed to close out the Comprehensive Operational Analysis (COA) of Omnitrans. The detailed fully-balanced plan that results as an outcome from the OmniConnects plan can be found in Chapter 12.

In December 2013, the Omnitrans Board of Directors received a seven-year funding plan (Fiscal Year 2014 – Fiscal Year 2020) that originally showed an operating deficit of \$12.81 million. The plan was developed based on Omnitrans’ projected operating costs, the economy, and San Bernardino Associated Governments’ (SANBAG) funding forecast. Omnitrans was tasked with developing a plan to reduce the deficit during the current fiscal year. After reviewing various options, a revised plan was developed, and is presented in Exhibit 1 and Exhibit 3. The plan is based on three major areas; 1) Organizational Restructuring, 2) Proposed Fare Changes, and 3) Risk Management.

**Organizational Restructuring** – Omnitrans restructured its senior management team by combining four departments into two. This provided Omnitrans the opportunity to reduce operating costs and gain operational efficiencies by reducing headcount.

**Proposed Fare Changes** – The original plan contained fare increases in FY2015 and FY2018. The Fare policy was revised to implement the fare increases in FY2015, FY2017 and FY2019 of the plan. These provided Omnitrans the ability to

generate an additional \$3.31 million in fare revenue.

**Risk Management** – A major component of Omnitrans’ operating cost is the reserves for outstanding workers compensation and liability claims. The reserves to settle outstanding claims are maintained at high confidence levels. After review of historical data, risk assessment, and industry standard, it was determined that Omnitrans can operate with lower reserves while aggressively pursuing cost containment.

### 7.1 Funding Sources

The funding assumptions are based on the funding sources currently available to Omnitrans. This includes existing revenue sources at the federal, state and local levels. The level of funding estimated to be available over the next six years (FY2015 - FY2020) is based on the fund estimates provided by the San Bernardino Associated Governments (SANBAG) and Omnitrans’ projections.

#### 7.1.1 Fare Revenues

The financial plan also assumes fare increases in FY2015 FY2017 and FY2019 of 16%, 14%, and 12% respectively. Details of the fare proposals are in Chapter 12

#### 7.1.2 Local Transit Funds

In 1972, SB 325 created a fund for local transportation purposes. These funds are derived from a ¼-cent sales tax and distributed by SANBAG. These Local Transit Funds (LTF) are intended to be "transit first" funding, meaning

that funds are expected to be spent on transit projects to the extent that such projects are meeting all "transit needs that are reasonable to meet."

There is no universally accepted definition of reasonable to meet, and individual Regional Transportation Planning Agencies (RTPAs) must make their own determination. These funds can be used for capital expenditures, operations, or a combination thereof. Omnitrans’ standard practice is LTF funds are assumed to be used for operations first, then as local match to federally funded capital projects when State Transit Assistance (STA) funds cannot be used.

SANBAG is responsible for allocating LTF in the San Bernardino Valley. Current SANBAG practice is to allocate the balance of LTF after commuter rail needs are met. LTF is currently at \$36.3 million in FY2014 and is estimated to grow by 3.0% annually through FY2020.

#### 7.1.3 State Transit Assistance Funds

State Transit Assistance funds (STA) are derived from the statewide sales tax on gasoline and diesel fuel through the Public Transportation Account (PTA) as part of the State Transportation Improvement Program (STIP). Proposition 42 passed by the voters in 2002, requires that state sales and use taxes on the sale of motor vehicle fuel be used for public transportation, city and county street and road repairs and improvements and state highway improvements. Proposition 42 revenue partially funds the Public Transportation

Account, with some of those funds available for STIP projects and some for STA.

STA funds are allocated to SANBAG and to each public operator. Funds apportioned to SANBAG are made available to operators based on their service area population.

STA funds can be used either for transit operations or capital projects. There are eligibility requirements that must be met in order for a transit operator to receive these funds. The operator must meet the applicable ratio of passenger fares to operating cost. In addition, operators seeking STA for operations must show that their most-recent audited operating cost per revenue vehicle hour does not exceed the prior year's or average of the prior three years' operating cost per revenue hour adjusted by the change in the Consumer Price Index for the same period.

Omnitrans uses STA funds for both operating cost and capital projects.

### 7.1.4 FTA Formula Funds

The FTA Section 5307 Large Urban Cities is a formula program with funds apportioned to urbanized areas with populations over 50,000. Funds can only be used for capital projects, including the purchase of vehicles and facility maintenance. While Section 5307 funds are targeted for capital purposes, operating expenses associated with vehicle maintenance may be "capitalized" and paid for with Section 5307 funds, up to 80% of total vehicle maintenance costs. Section 5307 funds require a 20% local match.

Omnitrans receives Section 5307 funds from two urbanized areas (UZAs): 1) Los Angeles/Long Beach UZA; and 2) Riverside/San Bernardino UZA. The Southern California Association of Governments (SCAG) is the designated recipient. Using federal transit data, SCAG determines the amount of Section 5307 funds apportioned to the areas based on a variety of variables. In the Riverside/San Bernardino UZA, funds are apportioned by SANBAG based on a variety of variables.

The level of Section 5307 funds available to Omnitrans is currently at \$16.9 million for FY2014 and is forecasted to remain at current levels through FY2020.

### 7.1.5 FTA Discretionary Funds

Historically, the Bus and Bus Facilities program (Section 5309 Bus and Bus Facilities) provided discretionary earmarks to transit agencies to fund vehicle purchases and facility improvement projects. In recent years, these were competitive grants.

With the recent passage of MAP-21, the competitive Bus and Bus Facilities program has been eliminated and replaced with the Section 5339 Bus and Bus Facilities Formula Program. Formula funding in FY2013 and FY2014 will be used to buy buses. The financial model assumes this funding continues through FY2020.

Other competitive grants are still available under Section 5309, such as New Starts/Small Starts for corridor and fixed guideway transit projects.

### 7.1.6 Congestion Mitigation and Air Quality (CMAQ)

Certain funds made available through the Federal Highway Administration are considered flexible funds and can be used for transit capital projects. They are the Surface Transportation Program (STP) and the Congestion Mitigation and Air Quality Program (CMAQ). In reality, STP funds are generally used for streets and road projects and are not available for transit. The exception to this rule is discussed under new funding alternatives.

The CMAQ program provides funds for projects that contribute to the attainment or maintenance of federal air quality standards. These funds are distributed by SANBAG to all eligible jurisdictions in the County. A wide variety of public agencies is eligible for CMAQ funds; however, Omnitrans has received a set-aside of funds for the purchase of vehicles. CMAQ funds are primarily used for capital projects, and are restricted to projects that improve air quality. A portion of CMAQ funding may be used to support the operating expenses for new or expanded transit service, but only for the first three years of operation.

SANBAG has determined priorities for the allocation of CMAQ funds estimated to be available between FY2014 and FY2020. Omnitrans has secured a commitment of approximately \$40.8 million in CMAQ funds for fixed route replacement vehicles for FY2014 – FY2020.

### 7.1.7 Measure I Local Sales Tax For Transit

The ½-cent sales tax available for transportation projects in San Bernardino County is administered by SANBAG. As part of the Measure I sales tax, 8 percent of the Valley subarea's total share is

apportioned to the Senior and Disabled (S&D) fund. From the S&D fund, a minimum of 25 percent was used to implement, and will continue to be used to support operation of the Consolidated Transportation Services Agency (CTSA). This agency, known as Valley Transportation Services (VTrans), is responsible for the coordination of social service transportation for elderly individuals, individuals with disabilities and families of limited financial means.

The remaining 75 percent of Measure I - S&D funds are to be used to reduce fares and enhance transit service for elderly individuals and individuals with disabilities. Funding for Measure I – S&D expenditures are approved by SANBAG.

Projected Measure I - S&D estimates reflect SCAG's 2012 RTP Population Valley Programs. This estimate was developed for planning purposes and assumes a 4.7 percent annual increase in Measure I sales tax revenue, including 2.5 percent in annual inflation. The annual growth rates are consistent with the growth rates included in the Measure I Ten-Year Delivery Plan. Omnitrans' Measure I & Subsidy revenue currently at \$5.1 million for FY2014 assumes annual of \$0.2 - \$0.3 million annually through FY2020.

### 7.1.8 Other Federal Grant Programs

There are other federal funding sources available to Omnitrans. These funding sources include FTA Section 5310 Transportation for Elderly Persons and Persons with Disabilities; Section 5316 Job Access and Reverse Commute (JARC), and Section 5317 New Freedom Program.

Section 5310 funds are used to provide transportation services to meet the special needs of the elderly and persons with disabilities. Funds are obligated based on the annual program of projects included in a statewide grant application. In the past, the program was administered by Caltrans and grants were awarded on a competitive basis. Under MAP-21, this program will be administered at the local level. Omnitrans has not included any of this funding in our current plan since these funds are currently uncertain.

Section 5316 funds are used to develop transportation services designed to transport welfare recipients and low-income individuals to and from jobs and to develop transportation services for residents of urban centers and rural and suburban areas to suburban employment opportunities.

Section 5317 is a new program established with the passage of SAFETEA-LU was designed to encourage services and facility improvements to address the transportation needs of persons with disabilities that go beyond those required by the Americans with Disabilities Act. Both of these programs have undergone changes under MAP-21, therefore Omnitrans is uncertain of funding levels it may receive and has therefore not included these in the current plan.

### 7.1.9 Proposition 1B State Infrastructure Bonds

The Highway Safety, Traffic Reduction, Air Quality, and Port Security Bond Act of 2006, approved by the voters as Proposition 1B on November 7, 2006, authorized \$19.9 billion in general obligation bond proceeds, of which \$2 billion were to be available

for projects in the State Transportation Improvement Program to augment funds otherwise available for the STIP from other sources.

Funds are distributed by formula to transit operators and regional agencies for rehabilitation safety or modernization improvements, capital service enhancements or expansions, new capital projects, bus rapid transit improvements and, and for rolling stock procurement, rehabilitation and replacement. Omnitrans' share of Proposition 1B Public Transportation Modernization Improvement, and Service Enhancement Account Program (PTMISEA) funds is \$30.8 million through FY2020. The ability of the State of California to issue bonds will greatly impact the timing of these funds.

### 7.1.10 In-Kind Transfers

In-kind transfers are donations of land or other assets used to complete an infrastructure project. In-kind transfers can be of various forms, including transfers from private developers and/or from other government agencies.

### 7.1.11 Advertising and Auxiliary Revenues

Omnitrans generates revenues from investment income and advertising allowed on its vehicles. On an annual basis, these two sources generate about \$0.4 million in FY2013 that was used for operations. In FY2014, \$0.4 million is budgeted based on low interest rates and an uncertain economy. There are signs of advertising picking up again and these funds are projected at \$0.7 million from FY2015 – FY2020.

Exhibit 43 identifies the operating funding and Exhibit 44 identifies the capital funding sources and the revenue projections for FY2014 – FY2020.

**Exhibit 43: Omnitrans Operating Revenues Forecast (Millions)**

SOURCE	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	TOTAL
LTF	\$36.34	\$37.44	\$38.56	\$39.72	\$40.91	\$42.14	\$43.40	\$278.52
Measure I - S&D	\$5.10	\$5.30	\$5.60	\$5.80	\$6.10	\$6.40	\$6.70	\$41.00
STA - Operator	\$1.10	\$0.90	\$0.90	\$0.90	\$0.90	\$0.90	\$0.90	\$6.51
STA - Population <sup>1</sup>	\$2.98	\$3.17	\$3.10	\$3.10	\$3.10	\$3.10	\$3.10	\$21.65
Federal	\$10.90	\$10.90	\$10.90	\$10.90	\$10.90	\$10.90	\$10.90	\$76.30
Other	\$0.39	\$0.56	\$0.70	\$0.70	\$0.70	\$0.70	\$0.70	\$4.45
Fares <sup>2</sup>	\$14.75	\$17.20	\$17.54	\$18.47	\$18.95	\$19.87	\$20.38	\$127.16
<b>Total Operating Revenue</b>	<b>\$71.56</b>	<b>\$75.47</b>	<b>\$77.31</b>	<b>\$79.59</b>	<b>\$81.56</b>	<b>\$84.01</b>	<b>\$86.09</b>	<b>\$555.59</b>

<sup>1</sup> Use of STA – Population funds for operations requires compliance with efficiency standards defined in CPUC Section 99314.6 related to total operating cost per revenue hour annual increase to CPI.

<sup>2</sup> Fare revenue are adjusted to include implementation of the sbX Green Line and Fare increases.

**Exhibit 44: Omnitrans Capital Revenues Forecast (Millions)**

SOURCE	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	TOTAL
FTA Section 5307	\$6.04	\$6.04	\$6.04	\$6.04	\$6.04	\$6.04	\$6.04	\$42.28
FTA Section 5339	\$3.53	\$1.76	\$1.76	\$1.76	\$1.76	\$1.76	\$1.76	\$14.09
CMAQ	\$5.20	\$5.15	\$5.18	\$6.66	\$5.56	\$5.47	\$7.62	\$40.84
STA - Pop. Alloc.	\$0.17	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.17
Prop 1B PTMISEA	\$7.90	\$4.05	\$4.22	\$2.94	\$4.34	\$4.67	\$2.72	\$30.84
Prop 1B TSGP	\$0.13	\$0.13	\$0.13	\$0.13	\$0.13	\$0.13	\$0.13	\$0.91
<b>Total Capital Revenue</b>	<b>\$22.97</b>	<b>\$17.13</b>	<b>\$17.33</b>	<b>\$17.53</b>	<b>\$17.83</b>	<b>\$18.07</b>	<b>\$18.27</b>	<b>\$129.13</b>



## 7.2 Operating Expenses

Omnitrans is accounted for as an enterprise fund (proprietary fund type) using the economic resources measurement focus, and the accrual basis of accounting. A fund is an accounting entity with a self-balancing set of accounts established to record the financial position and results of operations of a specific governmental activity. The activities of enterprise funds closely resemble those of ongoing businesses in which the purpose is to conserve and add to basic resources while meeting operating expenses from current revenues. Enterprise funds account for operations that provide services on a continuous basis and are substantially financed by revenues derived from user charges. Revenues are recognized when earned and expenses are recognized as they are incurred.

Enterprise funds distinguish operating revenues and expenses from non-operating items. Operating revenues and expenses generally result from providing services and producing and delivering goods in connection with an enterprise fund's principal operations. The principal operating revenues of Omnitrans consist of bus transit services. Non-operating revenues consist of federal, state and local operating grants, investment income, and special charges that can be used for either operating or capital purposes. Operating expenses for enterprise funds include the cost of sales, administrative expenses and depreciation on capital assets.

Omnitrans operating expenses are the expenses associated with the operation of the transit agency and goods and services purchased for system

operation. It is the sum of either the functions or the object classes listed below:

Operating Expense Function is an activity performed or cost center of a transit agency. The four basic functions are:

- ▶ **Vehicle Operations** includes all activities associated with the subcategories of the vehicle operations function: transportation administration and support; revenue vehicle operation; ticketing and fare collection; and system security.
- ▶ **Vehicle Maintenance** includes all activities associated with revenue and non-revenue (service) vehicle maintenance, including administration, inspection and maintenance, and servicing (cleaning, fueling, etc.) vehicles.
- ▶ **Non-Vehicle Maintenance** includes all activities associated with facility maintenance, including: maintenance of vehicle movement control systems; fare collection and counting equipment; structures, tunnels and subways; roadway and track; passenger stations, operating station buildings, grounds and equipment; communication systems; general administration buildings, grounds and equipment; and electric power facilities.
- ▶ **General Administration** includes all activities associated with the general administration of the transit agency, including transit service development, injuries and damages, safety, personnel administration, legal services, insurance, data processing, finance and accounting, purchasing and stores,

engineering, real estate management, office management and services, customer services promotion, market research and planning.

Operating Expense Object Class is a grouping of expenses on the basis of goods and service purchased. Eight Object Classes are reported on as follows:

- ▶ **Salaries and Wages** are the pay and allowances due employees in exchange for the labor services they render on behalf of the transit agency. The allowances include payments direct to the employee arising from the performance of a piece of work.
- ▶ **Fringe Benefits** are the payments or accrual to others (insurance companies, governments etc.) on behalf of an employee and payment and accruals direct to an employee arising from something other than a piece of work.
- ▶ **Services** include the labor and other work provided by outside organizations for fees and related expenses. Services include management service fees, advertising fees, professional and technical services, temporary help, contract maintenance services, custodial services and security services.
- ▶ **Materials and Supplies** are the tangible products obtained from outside suppliers or manufactured internally. These materials and supplies include spare parts, tires, fuel and lubricants. Freight, purchase discounts, cash discounts, sales and excise taxes (except on fuel and lubricants) are included in the cost of the material or supply.

- ▶ **Occupancy/Utilities** include the payments made to various utilities for utilization of their resources (e.g., electric, gas, water, telephone, etc.). Utilities include propulsion power purchased from an outside utility company and used for propelling electrically driven vehicles, and other utilities such as electrical power for purposes other than for electrically driven vehicles, water and sewer, gas, garbage collection, and telephone.
- ▶ **Casualty and Liability** Costs are the cost elements covering protection of the transit agency from loss through insurance programs, compensation of others for their losses due to acts for which the transit agency is liable, and recognition of the cost of a miscellaneous category of corporate losses.
- ▶ **Purchased Transportation** is transportation service provided to a public transit agency or governmental unit from a public or private transportation provider based on a written contract. Purchased transportation does not include franchising, licensing operation, management services, cooperative agreements or private conventional bus service.
- ▶ **Other Operating Expenses** is the sum of taxes, membership dues, travel, and other miscellaneous expenses.

OmniTrans' Operating Expense Forecast is shown in the table below by operating expense object class. Included in the forecast are operating costs associated with the introduction of the sbX Green Line service scheduled to launch in the second half

**Exhibit 45: Omnitrans Operating Expenses Forecast (Millions)**

OBJECT CLASS	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	TOTAL
Salary & Wages	\$25.52	\$26.98	\$27.79	\$28.62	\$29.48	\$30.37	\$31.28	\$200.05
Fringe Benefits	\$15.98	\$17.28	\$17.91	\$18.58	\$19.27	\$19.98	\$20.73	\$129.72
Services	\$3.09	\$3.11	\$3.32	\$3.39	\$3.45	\$3.52	\$3.59	\$23.47
Materials & Supplies	\$9.30	\$9.89	\$10.09	\$10.31	\$10.52	\$10.74	\$10.97	\$71.82
Occupancy/Utilities	\$3.22	\$3.67	\$4.10	\$4.18	\$4.26	\$4.35	\$4.43	\$28.20
Casualty & Liability	\$5.16	\$4.46	\$3.43	\$3.63	\$3.46	\$3.70	\$3.50	\$27.34
Purchased Transp.	\$9.06	\$9.12	\$9.31	\$9.49	\$9.68	\$9.88	\$10.07	\$66.61
Other Expenses	\$0.23	\$0.96	\$1.36	\$1.40	\$1.44	\$1.48	\$1.52	\$8.37
<b>Total Operating Expenses</b>	<b>\$71.56</b>	<b>\$75.47</b>	<b>\$77.31</b>	<b>\$79.59</b>	<b>\$81.56</b>	<b>\$84.01</b>	<b>\$86.09</b>	<b>\$555.59</b>

of FY2014. The operating budget for FY2014 is approximately \$71.6 million. This is an increase of approximately \$2.3 million or 3.3% over FY2013.

### 7.3 Finance Plan – Capital

#### 7.3.1 Agency-Wide Capital Plan

The components of the project capital plan are summarized and incorporated into the agency-wide capital plan. The agency plan presents capital funding and spending for each individual funding source and each individual capital project planned during FY2014 – FY2020. Capital plan documentation includes project names and descriptions, total capital costs and schedules, and proposed federal funding contributions for each planned capital project. The agency-wide capital

plan includes bus and service vehicle replacement consistent with the fleet management plans prepared by the transit agency.

OmniTrans' six-year capital plan emphasizes replacement and state of good repair first, and includes significant constraints compared to previous expansion plans. The forecasted six-year total capital revenues presented in detail earlier in Exhibit 44.

#### 7.3.2 Revenue Vehicles

OmniTrans' capital plan includes funding for the purchase of revenue vehicles. OmniTrans' revenue vehicles are principally three types: (1) Forty-foot CNG powered vehicles for operations in its fixed-route service; (2) Sixty-foot CNG powered vehicles for operations of sbX service; and (3) Sixteen

passenger medium-sized vehicles and eleven passenger vans to operate its demand response service. Omnitrans has leveled the replacement schedule of these vehicles to coincide with available funding. The proposed capital plan calls for the purchase of fifteen forty-foot vehicles and fifteen demand response vehicles per year. This replacement schedule conforms to FTA’s recommended replacement cycle for revenue vehicles. The new sbX articulated buses lifespan is longer than the planning horizon of OmniConnects.

### 7.3.3 Service Vehicles

Omnitrans utilizes various non-revenue service vehicles including relief cars used by coach operators and administrative staff. Trucks and vans are also used for support activities. These vehicles may be purchased or leased based on their use, and the needs of the agency. The capital plan includes the funding necessary for replacement of these support vehicles.

### 7.3.4 Management Information Systems (MIS)

This capital expenditure is necessary to enhance, improve and maintain all management information systems, communications systems and other systems throughout Omnitrans. The MIS investments will be used to replace/supplement outdated equipment with the intent of improving operating efficiencies.

### 7.3.5 Facilities

Facility expenditures are necessary to maintain and enhance Omnitrans’ infrastructure. These costs include facility upgrades, office and shop equipment acquisitions, and other capital items needed to ensure that Omnitrans’ facilities are kept in working order. These capital expenditures do not include any major stops or stations costs.

### 7.3.6 Transit Enhancements

Section 5307 guidelines stipulate that the recipient for an urbanized area with a population of at least 200,000 must expend not less than one percent of the amount the recipient receives each fiscal year

under Section 5307 for transit enhancements. Transit enhancement expenditures represent cost for pedestrian improvements, bus stops, and other capital projects within the service area.

The table below shows Omnitrans’ capital expenditures forecasts for the six years covering FY2014 – FY2020 compared to forecasted revenues and the resulting surplus or deficit.

The Capital Plan for Omnitrans presented in the Exhibit 46 below detail the federal and non-federal funding sources for the capital projects

Exhibit 46: Omnitrans Capital Expense Forecast (Millions)

PROJECT	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	TOTAL
Revenue Vehicles	\$10.80	\$10.82	\$11.02	\$11.22	\$11.52	\$11.70	\$11.90	\$78.99
Support Vehicles	\$0.57	\$0.63	\$0.63	\$0.63	\$0.63	\$0.75	\$0.75	\$4.59
IT Projects	\$3.37	\$2.40	\$2.40	\$2.40	\$2.40	\$2.50	\$2.50	\$17.97
Facilities	\$5.35	\$1.63	\$1.63	\$1.63	\$1.63	\$1.73	\$1.73	\$15.33
Transit Enhancements	\$0.25	\$0.25	\$0.25	\$0.25	\$0.25	\$0.25	\$0.25	\$1.75
<b>Total Capital Projects</b>	<b>\$20.34</b>	<b>\$15.73</b>	<b>\$15.93</b>	<b>\$16.13</b>	<b>\$16.43</b>	<b>\$16.93</b>	<b>\$17.13</b>	<b>\$118.66</b>
<b>Total Capital Revenue</b>	<b>\$22.97</b>	<b>\$17.13</b>	<b>\$17.31</b>	<b>\$17.53</b>	<b>\$17.83</b>	<b>\$18.07</b>	<b>\$18.27</b>	<b>\$129.14</b>
<b>Surplus/(Deficit)</b>	<b>\$2.63</b>	<b>\$1.40</b>	<b>\$1.40</b>	<b>\$1.40</b>	<b>\$1.40</b>	<b>\$1.14</b>	<b>\$1.14</b>	<b>\$10.52</b>

FY 2014	FTA 5307	FTA 5339	CMAQ	STA	Prop 1B TGSP	Prop 1B PTMISEA	Totals
Revenue Vehicles	\$1.20	\$3.40	\$5.20			\$1.00	\$10.80
Support Vehicles	\$0.45			\$0.07		\$0.04	\$0.57
IT Projects	\$2.70			\$0.03		\$0.64	\$3.37
Facilities	\$1.50			\$0.02	\$0.13	\$3.70	\$5.35
Transit Enhancements	\$0.20			\$0.05		\$0.00	\$0.25
<b>Totals</b>	<b>\$6.05</b>	<b>\$3.40</b>	<b>\$5.20</b>	<b>\$0.17</b>	<b>\$0.13</b>	<b>\$5.38</b>	<b>\$20.34</b>

FY 2015	FTA 5307	FTA 5339	CMAQ	STA	Prop 1B TGSP	Prop 1B PTMISEA	Totals
Revenue Vehicles	\$0.88	\$1.70	\$5.15			\$3.09	\$10.82
Support Vehicles	\$0.50					\$0.13	\$0.63
IT Projects	\$1.92					\$0.48	\$2.40
Facilities	\$1.20				\$0.13	\$0.30	\$1.50
Transit Enhancements	\$0.20					\$0.05	\$0.25
<b>Totals</b>	<b>\$4.70</b>	<b>\$1.70</b>	<b>\$5.15</b>	<b>\$0.00</b>	<b>\$0.13</b>	<b>\$4.05</b>	<b>\$15.73</b>

FY 2016	FTA 5307	FTA 5339	CMAQ	STA	Prop 1B TGSP	Prop 1B PTMISEA	Totals
Revenue Vehicles	\$0.88	\$1.70	\$5.18			\$3.26	\$11.02
Support Vehicles	\$0.50					\$0.13	\$0.63
IT Projects	\$1.92					\$0.48	\$2.40
Facilities	\$1.20				\$0.13	\$0.30	\$1.63
Transit Enhancements	\$0.20					\$0.05	\$0.25
<b>Totals</b>	<b>\$4.70</b>	<b>\$1.70</b>	<b>\$5.18</b>	<b>\$0.00</b>	<b>\$0.13</b>	<b>\$4.22</b>	<b>\$15.93</b>

FY 2017	FTA 5307	FTA 5339	CMAQ	STA	Prop 1B TGSP	Prop 1B PTMISEA	Totals
Revenue Vehicles	\$0.88	\$1.70	\$6.66			\$1.98	\$11.22
Support Vehicles	\$0.50					\$0.13	\$0.63
IT Projects	\$1.92					\$0.48	\$2.40
Facilities	\$1.20				\$0.13	\$0.30	\$1.63
Transit Enhancements	\$0.20					\$0.05	\$0.25
<b>Totals</b>	<b>\$4.70</b>	<b>\$1.70</b>	<b>\$6.66</b>	<b>\$0.00</b>	<b>\$0.13</b>	<b>\$2.94</b>	<b>\$16.13</b>

FY 2018	FTA 5307	FTA 5339	CMAQ	STA	Prop 1B TGSP	Prop 1B PTMISEA	Totals
Revenue Vehicles	\$0.88	\$1.70	\$5.56			\$3.38	\$11.52
Support Vehicles	\$0.50					\$0.13	\$0.63
IT Projects	\$1.92					\$0.48	\$2.40
Facilities	\$1.20				\$0.13	\$0.30	\$1.63
Transit Enhancements	\$0.20					\$0.05	\$0.25
<b>Totals</b>	<b>\$4.70</b>	<b>\$1.70</b>	<b>\$5.56</b>	<b>\$0.00</b>	<b>\$0.13</b>	<b>\$4.34</b>	<b>\$16.43</b>

FY 2019	FTA 5307	FTA 5339	CMAQ	STA	Prop 1B TGSP	Prop 1B PTMISEA	Totals
Revenue Vehicles	\$0.88	\$1.70	\$5.47			\$3.65	\$11.70
Support Vehicles	\$0.60					\$0.15	\$0.75
IT Projects	\$2.00					\$0.50	\$2.50
Facilities	\$1.28				\$0.13	\$0.32	\$1.73
Transit Enhancements	\$0.20					\$0.05	\$0.25
<b>Totals</b>	<b>\$4.96</b>	<b>\$1.70</b>	<b>\$5.47</b>	<b>\$0.00</b>	<b>\$0.13</b>	<b>\$4.67</b>	<b>\$16.93</b>

FY 2020	FTA 5307	FTA 5339	CMAQ	STA	Prop 1B TGSP	Prop 1B PTMISEA	Totals
Revenue Vehicles	\$0.88	\$1.70	\$7.62			\$1.70	\$11.90
Support Vehicles	\$0.60					\$0.15	\$0.75
IT Projects	\$2.00					\$0.50	\$2.50
Facilities	\$1.28				\$0.13	\$0.32	\$1.73
Transit Enhancements	\$0.20					\$0.05	\$0.25
<b>Totals</b>	<b>\$4.96</b>	<b>\$1.70</b>	<b>\$7.62</b>	<b>\$0.00</b>	<b>\$0.13</b>	<b>\$2.72</b>	<b>\$17.13</b>

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## 8 PERFORMANCE MEASURES AND STANDARDS

Omnitrans uses key performance indicators (KPIs) to evaluate performance in order to refine services offered and business practices. These KPIs are compared to the established goals and standards outlined in this chapter.

### 8.1 Performance Metric Origins

The goals and standards set in this section are guided by the strategic vision set by Omnitrans' Board of Directors as expressed through Omnitrans' Senior Leadership.

The specific targets are based on Omnitrans' established pattern of setting reach goals and an evaluation of historical and peer performance.

Omnitrans' KPIs are compared to historical performance in order to identify and capitalize on positive trends and to reverse negative trends.

Omnitrans participates in the American Bus Benchmarking Group (ABBG) in order to facilitate a routine sharing and comparison of peer data to Omnitrans' own performance.

The Comprehensive Operational Analysis (COA) of Omnitrans evaluated multiple standards, goals and metrics. The recommendations from the COA were considered in the development of these KPIs.

The specific tracking of current performance against established goals was completed in the COA and not replicated within the OmniConnects plan. The COA also completed a peer benchmark on goals rather than performance that also

facilitated the establishment of the goals presented.

### 8.2 Measurement Objectives

In developing metrics, there are multiple considerations included. For instance, the measurement must be useful in improving the customer experience, reducing costs or be of value in improving the effectiveness or efficiency of the business. Some key considerations included were:

- ▶ Customer Focused;
- ▶ Cost-Effective;
- ▶ Clear, Measurable & Quantifiable;
- ▶ Equally Applied in All Municipalities;
- ▶ Equally Applied to All Residents;
- ▶ Easy to Implement and Monitor; and,
- ▶ Responsive to Change.

### 8.3 Omnitrans' OmniConnects Goals

The introduction to OmniConnects identified seven key overarching goals associated with the plan. Omnitrans intends to track measures for each of these goals against Omnitrans' trend and as compared to ABBG peer agencies at least annually (at the end of each fiscal year) in order to quantify the impact of the OmniConnects Short Range Transit Plan.

The seven goals and measurement strategies are:

1. **Deliver safe, reliable, clean, frequent, convenient, comfortable and equitable service.**
  - ▶ **Safe:** Preventable Collisions per million miles

- ▶ **Reliable:** On-time performance, headway adherence, pull-out reliability, vehicle failure rates
- ▶ **Clean:** Customer satisfaction survey
- ▶ **Frequent:** 65/35 Productivity/Coverage Split share of route by tier
- ▶ **Convenient:** Stop Spacing, Waking Distance Share of Population in route draw area
- ▶ **Comfortable:** Customer satisfaction survey and load factor
- ▶ **Equitable:** Title VI Compliance

#### 2. **Enhance Omnitrans' network design to increase ridership and minimize costs by reducing redundancy.**

- ▶ **Ridership:** Overall trend; trend versus forecast; trend versus peers and average weekday ridership.
- ▶ **Minimize costs:** Cost per hour compared to trend and peers
- ▶ **Reducing redundancy:** Ratio of Road Miles to Route miles.

#### 3. **Minimize impact to existing riders while seeking opportunities to expand ridership.**

- Ridership:** Overall trend; trend versus forecast; trend versus peers and average weekday ridership.

#### 4. **Support the local economy by providing connections to where people want to go.**

- ▶ **Draw Area:** Share of population and trip generators within ½ mile of Omnitrans' routes.

- ▶ **Investment in key Transit Corridors:** Value of private and public investments made adjacent to high-quality service, such as the sbX Green Line or the San Bernardino Transit Center.
- 5. **Maximize cost recovery while charging a fair fare.**
- ▶ **Cost Recovery & Fare:** Farebox recovery ratio; trend and compared to peers.
- 6. **Support initiatives that are financially and environmentally sustainable in the short and long term.**
- ▶ **Financially Sustainable:** Annual budget variance.
- ▶ **Environmentally Sustainable:** Placement on APTA’s Sustainability Commitment
- 7. **Expand, maintain and improve existing vehicles, facilities and passenger amenities.**
- ▶ Amenity and Stop based Customer Satisfaction Ratings based on Omnitrans participation the ABBG customer satisfaction survey.
- ▶ Share of amenities at total number of stops compared to peers and trend.

For measuring these high level goals, Omnitrans did not set specific targets. These particular goals are targeted at continual improvement compared to past performance and peer performance. However, for many of the specific measures, described below, these same measures do have targets established.

## 8.4 Types of Performance Measures

Omnitrans goals, standards and performance metrics are divided into four key areas:

- ▶ **Service Warrants** describe and set Omnitrans’ principles, conditions and expectations when considering new service.
- ▶ **Service Standards** describe and set Omnitrans’ routing principles, frequency requirements, span of service, walking standards and similar measures.
- ▶ **Service KPIs** track the performance of specific routes and modes to determine which specific service offerings are most productive, most effective, and most efficient. The measures are tracked and analyzed with the highest frequency at the greatest level of granularity.
- ▶ **Business KPIs** track the performance of broader levels of Omnitrans performance that is not specifically tied to a route. These include measures associated with safety, staffing efficiency, attendance, maintenance, and costs.

Each of these measure are used for different purposes, tracked at different intervals and are evaluated at different levels of granularity.

## 8.5 Performance Ranges

In previous Short-Range Transit Plans (SRTPs), Omnitrans had set performance metrics as a single number to target. This type of metric is easy to measure against and easy to explain. This creates a scenario where all measures are pass/fail and do

not necessarily mix well with the concept of reach goals.

In this SRTP, Omnitrans is adopting a more holistic view of metrics. All of the service KPIs are expressed in ranges which allow the measures to better define exceptional, acceptable and unacceptable outcomes. These will be evaluated as if looking at a stoplight where green represents exceptional, yellow is acceptable and red is unacceptable. In defining the measures this way, the standards can be more easily used to manage the service offered because routes will have multiple measurable outcomes. The standards and warrants are not measured in the same manner because they do not track performance but determine if service should be offered or what the service that is offer should look like.

## 8.6 Service Warrants

Service warrants are goals and standards that are used to determine if new services are warranted and viable. They address when services should be considered as part of this SRTP or should land use change before the next SRTP is developed.

### 8.6.1 Productive-Oriented and Coverage-Oriented Service

In 2001, the Omnitrans Board of Directors established a standard for resource allocation amongst routes and services. The standard was expressed in the FY2002-FY2007 Short-Range Transit Plan that as new service resources are added, they should be added such that Omnitrans moves to 65% productive-oriented service and 35% coverage-oriented services.

In 2001, Omnitrans' service was allocated approximately 50%/50% to productive-oriented and coverage-oriented service. Through a number of service changes, Omnitrans 2013 split remained near 50%/50% because the overall hours of service Omnitrans operated remained about the same.

In OmniConnects, Omnitrans proposes to meet this goal by modifying existing service as well as focusing on adding productivity-oriented services. As a result, evaluations for service warrants will be weighted heavily towards productivity-oriented service compared to coverage-oriented service. The purpose for this is the cost per passenger on productivity-oriented services is often 30% to 50% less than the cost on coverage-oriented services. As a result, Omnitrans can deliver significantly more passengers on productivity-oriented services with the same sized budget.

The OmniConnect plan also defines Productive-oriented services as:

- ▶ **Frequent service**, 20 minute headway or better
- ▶ **Direct Travel** typically straight-line corridor oriented routes.
- ▶ **Faster travel**
- ▶ **Bus stop amenities** are more prevalent since there is higher ridership
- ▶ **Express, Limited Stop or BRT Service** by design are productivity-oriented service as are any local underlay route related to one of these higher quality transit options.

## 8.6.2 Service Warrants Detail

Prior to the recommendation of new services an analysis of ridership is required. A decision should be based on the probability of attracting sufficient ridership to meet the approved minimum farebox recovery ratio.

In some cases, new services may only be warranted during weekday peaks when hourly productivity is sufficient to support farebox recovery requirements. In other cases, service requests to new business parks or new residential subdivisions could be considered through a joint partnership with major employers or developers

to offset farebox recovery shortfalls when initial ridership during the early phases of development is too low to support the approved farebox recovery minimum.

### 8.6.2.1 Fixed Route & OmniGo Warrants

The goals and standards used for the introduction of new or increased fixed route service are summarized in the Exhibit 47.

### 8.6.3 OmniLink Warrants

Omnitrans proposes the elimination of OmniLink within this OmniConnects because OmniGo has proven to be a more successful model of delivering transit service. Therefore, Omnitrans

Exhibit 47: Fixed Route and OmniGo Service Warrants

Description	Measure	Target
Coverage Gap	Distance from nearest service	Closest service greater than ½ mile
Residential Market	Minimum Residential Density	Express: 4 dwelling units /acre in 20 mile catchment Hourly: 4 dwelling units /acre 30 Minute: 7 dwelling units /acre OmniGo: 4 dwelling units /acre
Employment Market	Min commercial retail, office density—million square feet (MSF)	Express: 11 MSF in 20 mile catchment area Hourly: 11 MSF 30 minute: 18 MSF OmniGo: 11 MSF
Employment Market	Min industrial / business park density—million square feet	Express: 5MSF in 20 mile catchment area Hourly: 5 MSF 30 minute: 8 MSF OmniGo: 5 MSF
Performance	Farebox recovery	Must show growth during first 12 months and meet standards within 24 months.
Route Deviation	Ratio of through passenger time added divided by deviation passenger time savings less walking time	Ratio less than 1 (net savings in total passenger travel time because of deviation)

proposes no service warrant for OmniLink service as Omnitrans does not foresee the need to add a new general-public dial-a-ride service to the family of service offerings.

### 8.6.4 Access Warrants

In accordance with ADA regulations, Access service coverage warrants are reliant upon fixed routes and are adjusted with the expansion or decrease of them to meet the federal guidelines of providing ADA demand response service. Access service is warranted and required within ¼-mile of any regular local fixed route.

### 8.6.5 Service Warrant Policy

If a new service is implemented following the warrant process, its performance should be evaluated in the following manner:

- ▶ **Trial Period of Operation:** New or enhanced routes would be operated on a trial basis for a period of 12 months and evaluated.
- ▶ **Warrants for Continuance:**
  - A new or changed route would be continued after the nine month trial period if the performance of the route reaches 75% of the minimum passengers per hour standard established for its route type
  - If the 75% performance level is not reached, the route would be subject to additional marketing and/or corrective actions such as further changes to the route structure, spans and headways.
  - New or changed routes would be expected to reach or exceed the minimum passengers

per hour standard after twelve months of operation.

▶ **Warrants for Discontinuance:**

- If a new or changed route remains below the minimum passengers per hour standard for six months following the implementation of marketing and corrective actions, the route would be discontinued or redesigned as appropriate.
- Normally, discontinuance would occur if a route cannot achieve 50% of the minimum passengers per hour standard established for the route.
- If the new or changed route reaches or exceeds the minimum passengers per hour standard after twelve months of operation, it would become a normal part of the transit system and subject to the same adjustment and review procedures as existing routes.

**8.7 Service Standards**

The service standards describe the key service characteristics once service is delivered. These characteristics describe frequency of service, hours of service, stop spacing and similar items.

**8.7.1 Fixed Route, OmniGo and sbX**

Express, local, OmniGo and sbX service standards are summarized in Exhibit 48. These standards are desired levels of service that Omnitrans wishes to offer. Occasionally, these standards are not met because of budgetary realities or the performance of a route does not meet requirements and hence may be modified below these prescribed

standards.

**Exhibit 48: sbX, Fixed Route and OmniGo Service Warrants**

Description	Measure	Target
Route Coverage	Bus stop distance from all consumer destinations (residencies, employment, schools, shopping centers, etc)	85% within ½ mile of a bus stop.
Route Structure	The route coverage should use the appropriate family and tier of service to achieve satisfactory service KPI results.	Routes should operate in a direct straight line manner, the more frequent the service and the higher quality the service the more direct the routing should be.
Bus Stop Spacing	Distance between stops	Local & OmniGo: stops should be placed approximately 0.25 miles apart (0.2-0.3 miles) Express: Stops should be a major transfer centers or destinations; typically spaced several miles apart. BRT: Stops should be placed no closer than 0.5 miles apart with average spacing near 1.0 miles apart.
Days of Service	Days of operations	Local & OmniGo: Routes should operate 7-days per week, unless performance does not warrant. Express: Should operate at least on weekdays, with evaluation of weekend service needs. BRT: Should operate at least on weekdays, with evaluation of weekend service needs.
Span of Service	Minimum Hours of Service	Weekdays: 6:00 A.M. to 9:00 P.M. Saturdays: 7:00 A.M. to 9:00 P.M. Sundays: 7:00 A.M. to 7:00 P.M.
Service Frequency	Minimum desired service frequency	Local: 30 minute weekday; 60 minute weekend OmniGo: 60 minute weekday; 60 minute weekend Express: 30 minute weekday; 60 minute weekend BRT: 10 minute peak weekday 15 minute off-peak weekday; 15 minute weekend
Vehicle Loads	Peak load factor (Ratio of number of people on-board to number of seats)	Local & OmniGo: 1.2; Freeway Express: 1.0; BRT: 1.5
Route Selection	Roads and streets that route will operate along	Buses will only operate along street engineered to facilitate safe and effective bus operations. Turning radii, street widths, bus size, overhead clearances and nature of intersection are considered in these standards.

## 8.7.2 OmniLink

Omnitrans proposes the elimination of OmniLink within this OmniConnects because OmniGo has proven to be a more successful model of delivering transit service. Therefore, Omnitrans proposes no new service standards for OmniLink. OmniLink should only be considered if it can achieve the required 20% farebox recovery ratio.

## 8.7.3 Access

Access must operate in accordance with ADA regulations and be provided in conjunction with fixed route service coverage.

## 8.8 Service KPIs

This category of evaluation includes service coverage and availability, productivity, and fiscal performance, as well as standards related to patron convenience and comfort. Some measures of service availability, including a comparison of the Omnitrans system with the underlying demographic and socio-economic conditions of the region and a congruency analysis as part of a determination of service needs. Other measures of service coverage, productivity and efficiency will be analyzed in this chapter.

These performance measures take into consideration the following five categories:

► **Service Development** – Guidelines form a consistent basis for service planning, and, in particular, for establishing minimum levels of service. Judgment and flexibility remain, but the guidelines assist in the development of new services and the refinement of existing services.

► **Evaluation** – Service design guidelines provide targets in the form of indicators and standards that enable individual route performance to be evaluated and monitored by management decision-makers.

► **Budgeting** – The preparation of annual budgets should reflect the goal of providing service to the policy levels established in the service design guidelines. This should enable the Board of Directors to focus on policy level decisions and the service impacts of budget adjustments.

► **Public Accountability** – Political decision-makers, transit customers, voters and taxpayers should be able to readily identify the minimum levels of service and performance that are to be provided. The allocation of the resources of the transit system must be seen to be based on equitable and rational criteria that are explicit and available for public scrutiny.

► **Title VI** – Title VI of the Civil Rights Act requires public transit agencies receiving federal funding to ensure that their service is provided without regard to race or the economic status of the residents. Application of service design guidelines provides a tool for design and evaluating service that does not discriminate on race or economic status.

In order to effectively measure the performance of routes three specific measures are evaluated:

► **Service Effectiveness:** – Measured by passengers per revenue hour to determine the “output” in terms of ridership for each unit of service that Omnitrans delivers. Service effectiveness measures are measured monthly and reported quarterly and annually.

► **Service Efficiency:** Measured by farebox recovery ratio. This measure is positively impacted when fare revenue and ridership increase or costs are reduced. The measure is measured monthly and quarterly, but reported annually due to seasonal fluctuations in revenue and cost data.

► **Service Reliability:** Measured in terms of on-time performance and headway adherence. This measure is designed to determine if Omnitrans is delivering the service as advertised in public time tables and in line with customer expectations.

Measures for service effectiveness and service efficiency are based on both the family of service and the tier of service. There are different standards for sbX, OmniGo, and Fixed Route. Since regular fixed route ridership accounts for over 90% of Omnitrans’ overall ridership, these are also broken into more refined measures by tier. Tier 1 routes are 15 minutes service or better; Tier 2 routes are 20 minute service, Tier 3 is 30 minute and Tier 4 is 60 minute service.

**Exhibit 49: Service Effectiveness KPIs (Passengers per hour)**

Service	Day	Green	Yellow	Red
<b>sbX</b>	Weekday	40	35	30
	Saturday	n/a	n/a	n/a
	Sunday	n/a	n/a	n/a
<b>Local Tier 1</b>	Weekday	35	30	25
	Saturday	30	25	20
	Sunday	25	20	18
<b>Local Tier 2</b>	Weekday	30	25	20
	Saturday	25	20	18
	Sunday	25	20	18
<b>Local Tier 3</b>	Weekday	30	25	20
	Saturday	25	20	18
	Sunday	22	18	16
<b>Local Tier 4</b>	Weekday	28	22	18
	Saturday	25	20	15
	Sunday	20	18	14
<b>OmniGo</b>	Weekday	10	7	5
	Saturday	8	6	4
	Sunday	7	5	4
<b>General Public Total</b>	Weekday	25	22	20
	Saturday	22	20	18
	Sunday	20	18	15
<b>Access</b>	Weekday	3.1	2.8	2.6
	Saturday	2.0	1.5	1.2
	Sunday	2.0	1.5	1.2
<b>Formula:</b>	Total number of passengers by route and day type divided by the total number of revenue hours by route and day type.			

**Exhibit 50: Service Efficiency KPIs (Farebox Recovery Ratio)**

Service	Day	Green	Yellow	Red
<b>sbX</b>	Weekday	30%	25%	20%
	Saturday	n/a	n/a	n/a
	Sunday	n/a	n/a	n/a
<b>Local Tier 1</b>	Weekday	30%	25%	20%
	Saturday	25%	20%	18%
	Sunday	25%	20%	18%
<b>Local Tier 2</b>	Weekday	28%	25%	20%
	Saturday	25%	20%	18%
	Sunday	20%	18%	15%
<b>Local Tier 3</b>	Weekday	25%	22%	20%
	Saturday	22%	18%	15%
	Sunday	20%	18%	15%
<b>Local Tier 4</b>	Weekday	28	22	18
	Saturday	25	20	15
	Sunday	20	18	14
<b>OmniGo</b>	Weekday	15%	9%	7%
	Saturday	10%	8%	6%
	Sunday	10%	8%	6%
<b>General Public Total</b>	Weekday	25%	22%	20%
	Saturday	22%	20%	18%
	Sunday	22%	20%	15%
<b>Access</b>	Weekday	13%	11%	10%
	Saturday	12%	11%	10%
	Sunday	12%	11%	10%
<b>Formula:</b>	Total fares collected by route and day type divided by total operating costs by route and day type.			



**Exhibit 51: Service Reliability KPIs (On-time Performance and Headway Adherence)**

Service	Measure	Green	Yellow	Red
<b>sbX</b>	Headway Adherence (percentage of trips spaced within ±3 minutes of scheduled headway)	90%	85%	82%
<b>All Fixed Routes</b>	Percentage of departures at all time points within 0 to +5 minutes of the scheduled departure time.	90%	85%	82%
<b>Access</b>	Share of trips delivered within the 30-minute scheduling window.	90%	88%	85%
<b>Formula:</b>	Headway Adherence: Share of trips within ±3 minutes of the expected 10 minute peak or 15 minute off-peak headway (bus spacing). Tracked using AVL data. On-Time performance: Share of trips that depart timepoints between 0 minutes and 5 minutes after the scheduled departure time. Before 0 minutes counts as early; After 5 minutes late. All are measured using AVL data.			

## 8.9 Business KPIs

The Business KPIs standards are designed to allow decision makers to ensure Omnitrans' performances are consistent with reaching established targets and using actual financial resources. These measures monitor safety, staffing efficiency, attendance, maintenance, and costs. A summary of each measurement is shown in Figure 4.

These measures are tracked separately because they are not tied to the delivery of a specific route, but to the totality of Omnitrans service.

Business KPIs are tracked in the following areas:

- ▶ Customer Satisfaction
- ▶ Reliability
- ▶ Safety & Security
- ▶ Labor
- ▶ Efficiency
- ▶ Access Measures

Exhibit 52: Business KPIs: Customer Satisfaction

Customer Satisfaction KPIs	Goal	Measure
Customer Satisfaction	90% or better	Positive response on overall customer satisfaction surveys. Omnitrans Attitude and Awareness Study, On-Board Intercept Studies or ABBG-based customer satisfaction study.
Complaints and compliments - Per 100,000 fixed route boardings	10 complaints 1 compliment	Tracked using customer feedback at the call center compared to overall ridership.
Complaints and compliments - Per 100,000 demand response boardings	15 complaints: (per month) .5 compliment: (per month)	Tracked using customer feedback at the call center compared to overall ridership.

Exhibit 53: Business KPIs: Reliability

Reliability KPIs	Goal	Measure
Mechanical	6,500 miles	Average distance between mechanical failures
Loss of Service - Operations	<500 hours per month (annual average)	Scheduled service that was not delivered. Average lost service less than 1% of all service.
Loss of Service - Maintenance	<35 hours per month (annual average)	Scheduled service that was not delivered. Average lost service less than 0.1% of all service.
Equipment Availability	100%	Vehicle availability at time of scheduled pullout
Preventable accidents	< 1 per 100,000 miles	Preventable accidents divided by number agency total miles.

**Exhibit 54: Business KPIs: Labor**

Labor KPIs	Goal	Measure
Passenger Trips/Employee (Annual)	21,870	Passenger trips divided by direct Omnitrans full time equivalent employees
Turnover	<10% exclusive of planned reductions	Number of annual separations from the agency divided by direct Omnitrans full time equivalent employees
Operations Absenteeism - Represented	<101,200 hours	Annual number of hours unplanned absenteeism by represented staff.
Training - Development (Annual)	5,000 hours	Annual number of training hours for all non-ATU staff.
ATU Represented (Annual)	4,400 hours	Annual number of training hours for all ATU represented staff.

**Exhibit 55: Business KPIs: Safety & Security**

Safety & Security KPIs	Goal	Measure
Injuries - Employee	Reduction of 3% OSHA Recordable Injuries measured annually for each fiscal year.	Measured as a trend against previous year's total (92) to determine compliance with trend standard.
Losses/Claims - Passengers (FY)	< 80	Claims for a loss by Omnitrans passengers per year.

**Exhibit 56: Business KPIs: Efficiency**

Efficiency KPIs	Goal	Measure
Systemwide Scheduling Efficiency	1.04	Total operating hours/revenue hours
Transportation Operator Efficiency	1,570	Annual operating hours/FTE operator
Transportation Supervision Efficiency	25,000	Annual revenue miles per employee controlling the operation (dispatch and field supervision)
Vehicle Maintenance Efficiency	80,000	Annual vehicle miles/maintenance employee (including clerical staff in vehicle maintenance administration; does not include plant and facility maintenance staff)
Administrative Efficiency	10,000	Annual revenue hours/non-line administrative employee (defined as Administration [Executive Director, Administrative Secretaries], IT Services, Marketing, Planning, Human Resources, Safety and Security, and Finance)

**Exhibit 57: Business KPIs: Efficiency**

Efficiency KPIs	Goal	Measure
Systemwide Scheduling Efficiency	1.04	Total operating hours/revenue hours
Transportation Operator Efficiency	1,570	Annual operating hours/FTE operator
Transportation Supervision Efficiency	25,000	Annual revenue miles per employee controlling the operation (dispatch and field supervision)
Vehicle Maintenance Efficiency	80,000	Annual vehicle miles/maintenance employee (including clerical staff in vehicle maintenance administration; does not include plant and facility maintenance staff)
Administrative Efficiency	10,000	Annual revenue hours/non-line administrative employee (defined as Administration [Executive Director, Administrative Secretaries], IT Services, Marketing, Planning, Human Resources, Safety and Security, and Finance)

**Exhibit 58: Business KPIs: Access**

Efficiency KPIs	Goal	Measure
Trips per Capita	2.8	Total ADA passenger trips (registrants) / population of the entire Omnitrans Access service area (use for budgetary purposes/track trends over time)
Average Travel Time	Comparable to length of time that the same trip would take on fixed route including walking time and transfer wait time.	% of passengers onboard travel time below maximum time
Trip Denial Rate	Per ADA requirement: zero denials (within prescribed guidelines / scheduling parameters)	% total passenger trips denied

## 9 SUSTAINABILITY

Sustainability is balancing the economic, social and environmental needs of a community. It is also adopting policies and programs that make good business and environmental sense.

Sustainability means making smarter choices with our resources today without sacrificing the quality of life and resources for our communities and environment tomorrow.

The public transportation industry is committed on a national level to the following:

- ▶ Employing practices in design and capital construction, such as using sustainable building materials, recycled materials, and solar and other renewable energy sources to make facilities as “green” as possible;
- ▶ Employing practices in operations and maintenance such as reducing hazardous waste, increasing fuel efficiency, creating more efficient lighting and using energy-efficient propulsion systems; and,
- ▶ Employing (and participating in) community-based strategies to encourage land use and transit-oriented development designed to increase public transit ridership.

Source: American Public Transportation Association, [www.apta.com/sustainability](http://www.apta.com/sustainability)

### 9.1 Regional Sustainability Efforts

Omnitrans’ present and future sustainability efforts are impacted by the following efforts occurring on a regional and statewide scale.

#### 9.1.1 Senate Bill 375

The state of California adopted SB 375 as a sustainable environmental policy; which has the expressed goal of encouraging regions to work together to reduce greenhouse gas (GHG) emissions. The plans emerging from this process will lead to more efficient communities that provide residents with alternatives to using single occupant vehicles.

SB 375 requires the California Air Resource Board to develop regional reduction targets for automobiles and light trucks GHG emissions. The regions, in turn, are tasked with creating “sustainable communities strategies,” (SCS) which combine transportation and land-use elements in order to achieve the emissions reduction target, if feasible.

SB 375 also offers local governments regulatory and other incentives to encourage more compact new development and transportation alternatives (<http://www.scag.ca.gov/sb375/factsheets.htm>).



## 9.1.2 Southern California Association of Governments' Sustainable Communities Strategy

The Southern California region has responded to these targets as defined by SB 375 through Southern California Association of Governments' (SCAG)'s incorporation of the Sustainable Communities Strategy (SCS) and the GHG reduction targets in SCAG's Regional Transportation Plan (RTP).

With a sustained commitment to collaborative and integrated planning, SCAG's 2012 RTP/SCS, approved in May 2012, focuses on the following key elements:

- ▶ A land use growth pattern that accommodates the region's future employment and housing needs and that protects sensitive habitat and resource areas;
- ▶ A transportation network that consists of public transit, highways, local streets, bikeways, and walkways;
- ▶ Transportation Demand Management (TDM) measures that reduce or eliminate peak-period demand on the transportation network, such as carpooling, telecommuting, vanpooling, and other innovative programs such as "parking pay-out;" and
- ▶ Transportation System Management (TSM) measures that maximize the efficiency of the transportation network, such as signal timing,

freeway ramp metering, and bottleneck relief/auxiliary lane projects.

Source: SCAG, <http://rtpscs.scag.ca.gov/>

## 9.1.3 San Bernardino County Active Transportation Network

Active transportation refers to human-powered transportation and low-speed electronic assist devices for elderly and disabled. Examples include bicycle, electric assist bicycle, tricycle, wheelchair, scooter and skateboard (source: SCAG, 2013 *Active Transportation Subcommittee*). These modes of transportation have the ability to increase an individual's likelihood of meeting the recommended amount of daily physical activity, reduce traffic congestion, and improve air quality, among other benefits.

Active transportation is of critical importance to Omnitrans, as the majority of Omnitrans' riders access the bus stop either by walking -- 94 percent -- or biking -- 4 percent (source: 2011 *Omnitrans On-Board, OmniLink, and Access Rider Study, Redhill Group*). There are many impediments facing active transportation users, such as discontinued or poorly maintained sidewalks, the lack of dedicated or connected bicycle facilities, poorly marked crosswalks, etc. This impacts safety and access to transit for Omnitrans' passengers.

While most communities in the San Bernardino Valley are working on projects to increase the walkability and bikeability of their streets, the cost of the pedestrian and bicycle facility projects

planned by local municipalities far exceeds the amount of funding currently available for them.

For this reason, Omnitrans is an active participant in SANBAG's San Bernardino County Active Transportation Network (SBCATN), along with the County of San Bernardino, Mov.I.E., the Inland Empire Biking Alliance, Safe Routes to School National Partnership, and the American Lung Association.

The goals of the Network are to provide clean transportation choices and to improve public safety, quality of life, the environment, and wellness and image of San Bernardino County by focusing on planning and partnership efforts that assist members in expanding their active transportation networks and encourage sustainability in transportation and planning.

## 9.2 Omnitrans' Sustainability Efforts

Omnitrans is a national leader in sustainability among the public transportation industry, having been among the first agencies in the country to implement clean natural gas vehicles, along with a host of other initiatives as shown in Exhibit 59.

## Exhibit 59: Omnitrans' Sustainability Initiatives – Past and Present

Description	Department	Year Started	Future Objectives
CNG Fueled Revenue vehicles	Maintenance	1997	Electric buses
Electric Vehicles (Relief Vehicles)	Maintenance	1998	
Paper Recycling	The Green Team	2007	
Smart Landscaping	Maintenance	2007	
Hybrid-Electric Revenue Vehicles	Maintenance	2000	
Water filter for tap, instead of buying water	Maintenance		Greywater reuse: Landscaping, toilets
Recycling Programs e.g. CRV bottles & cans	The Green Team	2010	Green cleaning Program
Office Supply email group	The Green Team	2010	
Ink Cartridge Recycling	The Green Team	2010	
Aluminum Recycling	Maintenance	2010	
Used Engine Oil Filters	Maintenance	2010	
Used Shop Rags	Maintenance	2010	
Household Batteries	Maintenance	2010	
Fluorescent Light Bulbs	Maintenance	2010	
Green Waste	Maintenance	2010	
Electronic Waste	Maintenance	2010	
Used Motor Oil	Maintenance	2011	Purchase recycled motor oil
Mixed Scrap Metal Recycling	Maintenance	2011	
Cardboard Recycling	Maintenance	2011	
Hybrid Cars (Relief Vehicles)	Maintenance	2012	
Motion-activated lighting	Maintenance	2012	Photovoltaic Panels
Light interior/reflects light			Low VOC materials
Solar-powered lights on bus shelters	Marketing/Maintenance	2013	Solar panels on facilities

Omnitrans' San Bernardino Transit Center, which is being designed and constructed by the San Bernardino Associated Governments (SANBAG) and is expected to open in late 2015, is designed to meet LEED Gold standards.

The Transit Center will provide connections between 13 of Omnitrans' local bus routes, Omnitrans' new sbX Green Line bus rapid transit service, Metrolink service, and other regional bus transportation providers.

The LEED Gold features of the San Bernardino Transit Center will include: drought-tolerant landscaping, smart heating/cooling systems and lighting systems, rooftop solar panels, bicycle parking, and other green features.

The Transit Center will provide information to the public about sustainability and how to reduce carbon footprint by utilizing the newly available public transportation options in San Bernardino.

### 9.3 APTA Sustainability Commitment

Sustainability is one of the core goals of the American Public Transportation Association (APTA).

APTA's Sustainability Commitment Program is a voluntary program in which member agencies pledge their commitment to sustainability. Signatories receive credit for their efforts to become more sustainable, facilitate the exchange of ideas, and promote sustainable practices.

Signatory agencies must commit to the following:

Exhibit 60: San Bernardino Transit Center Design (expected opening 2015)



Image provided by HDR for SANBAG, 2013

- ▶ Make sustainability part of the agency's strategic objectives;
  - ▶ Identify a sustainability champion within the agency who tracks key sustainability indicators and targets, reports annually to APTA, engages with the agency and community, and recommends and implements short and long term goals and programs;
  - ▶ Establish an outreach program on sustainability for staff; and
  - ▶ Establish a baseline measurement for key indicators.
- After signing on, agencies can work up to Bronze, Silver, Gold, and Platinum recognition levels by committing to and achieving progressively more action items and measurable targets. Targets are set to reduce or increase certain key indicators, measured by APTA's standard methodology. The indicators include the following:
- ▶ Water usage and pollutant discharge;



- ▶ Criteria air pollutant emissions;
- ▶ GHG emissions/savings;
- ▶ Energy use;
- ▶ Recycling levels/waste;
- ▶ Operating expense;
- ▶ Unlinked passenger trips; and
- ▶ Vehicle miles traveled.

Staff recommends signing onto the APTA Sustainability Commitment as part of the implementation of the OmniConnects Plan.

Omnitrans already has an employee sustainability outreach program through its interdepartmental employee-led Green Team.

The Green Team has identified and proposed several tentative action items:

- ▶ Institute a policy for purchasing eco-friendly vehicles;
- ▶ Institute a policy for purchasing recycled paper;
- ▶ Reduce paper use;
  - Electronic filing;
  - Paperless meetings;
- ▶ More direct deposit of checks / electronic transfer;
- ▶ Recycle ink cartridges;
- ▶ Install electric hand dryers in all facility restrooms;
- ▶ Initiate a solar (photovoltaic panel) purchase program;
- ▶ Reduce trash/increase recycling;

- ▶ Utilize more conference calls and videoconferences to reduce driving to meetings;
- ▶ Increase participation in employee Rideshare program; and,
- ▶ Employee bike share.

### 9.3.1 Omnitrans' Proposed Sustainability Targets

In order to advance in APTA's recognition levels, Omnitrans must set and meet measureable targets to increase or decrease certain defined indicators by at least 2% in 2 years. Omnitrans' staff recommends the following targets:

- ▶ Increase total fixed-route ridership by at least 2% in 2 years (FY 2013 to FY 2015);
- ▶ Reduce energy use (heating/cooling) by at least 2% in 2 years (FY 2013 to FY 2015);
- ▶ Reduce operating expense (increase cost efficiency) by 2% in 2 years;
- ▶ Increase GHG savings (displacement) by 2% in 2 years; and
- ▶ Reduce waste by 2% in 2 years.

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## 10 UNCONSTRAINED PLAN

An unconstrained plan is a service plan for which there are not currently enough available financial, capital and/or operating resources to provide the full complement of services described.

The unconstrained plan is not a just wish list of services, but the development of services that meet service delivery standards without being restrained by a budget. The unconstrained plan becomes the menu of choices that are used to derive the constrained plan.

Within the context of OmniConnects, the unconstrained plan will be used primarily as a mechanism to develop the constrained plan. The financial constraints that Omnitrans faces for the FY2015-2020 planning horizon currently require that Omnitrans strive to maintain the level of service offered today rather than see an expansion of service.

The OmniConnects unconstrained plan is designed and developed to:

- ▶ Provide policy makers with possible alternatives from which to select, refine and put forward into the constrained plan;
- ▶ Identify services that Omnitrans desires to provide in order to seek grant funding;
- ▶ Identify services that Omnitrans should consider implementing should existing services not meet standards and previously allocated resources become available; and,
- ▶ Continue to move projects towards a fully planned status to seek additional funding.

Many inputs are utilized to develop the unconstrained plan that ultimately expresses the need of the community described through public outreach, ongoing service requests, stakeholder input, and regular interactions with city staff.

In developing this plan, the majority of the outreach was completed during two separate rounds of public input sessions conducted during the Comprehensive Operational Analysis (COA) of Omnitrans. The COA public input and initial recommendations are a foundational document for OmniConnects.

### 10.1 Unconstrained Plan Approach

In developing the OmniConnects' unconstrained plan, the goals expressed in the introduction of this report were paramount. The two goals that were particularly relevant were:

- ▶ Enhance Omnitrans' network design to increase ridership and minimize costs by reducing redundancy; and,
- ▶ Minimize impact to existing ridership while seeking opportunities to expand ridership.

These goals were specifically implemented in the unconstrained plan through a five-fold approach:

- ▶ **Local routes:** streamline to improve travel speeds, directness of travel and transfer connections while also reconfiguring routes to build into the systems key corridors such as the sbX Green Line in the East Valley and Routes 61 and 66 in the West Valley.

- ▶ **sbX Green Line:** maximize the capital investment in the sbX Green Line by proposing weekend service and longer weekday service hours that matches existing trunk routes.
- ▶ **Future sbX BRT Corridors:** utilize the findings of the Foothill Corridor study, the Hol Corridor study and several city BRT studies to focus the development of the next two potential BRTs, both BRT-lights (rapids), on the West Valley Connector corridor and on the central portion the Foothill East and West Corridor.
- ▶ **Freeway Express:** build upon the continued ridership and productivity growth seen on Omnitrans' only freeway express route and the success of freeway programs at neighboring agencies, propose the expansion of the freeway express system from one route to a system of freeway express routes.
- ▶ **Other Services:** Access and OmniLink demand response service are derived based on the outcomes from the fixed route network rather than being based on their own developments.

The unconstrained plan laid out below is not in a priority order. They are organized based on the structured approach above and then organized geographically and then by route number. A summary table can be found in Exhibit 61.

**Exhibit 61: Summary of Proposed Unconstrained Plan by Family of Service**

Route	Annual Revenue Hours			Annual Fully Allocated Cost (2013 \$s)		
	Today	Proposed	Δ	Today	Proposed	Δ
<b>Local Fixed Route Service</b>	582,131	583,605	1,474	\$ 54,204,977	\$ 54,342,318	\$ 137,341
<b>OmniGo Fixed Route Service</b>	25,994	25,994	0	\$ 2,422,641	\$ 2,422,641	\$ -
<b>sbX Green Line</b>	0	31,300	31,300	\$ -	\$ 4,300,000	\$ 4,300,000
<b>Future sbX Corridors</b>	0	59,630	59,630	\$ -	\$ 7,200,000	\$ 7,200,000
<b>Freeway Express Totals</b>	11,645	27,241	15,596	\$ 1,085,314	\$ 2,538,861	\$ 1,453,547
<b>Demand Response Services</b>	182,214	182,214	0	\$ 12,569,094	\$ 12,569,094	\$ -
<b>Grand Total</b>	801,984	909,984	108,000	\$ 70,282,026	\$ 83,372,914	\$ 13,090,888

Exhibit 61 shows the total estimated cost and revenue hours for each member of Omnitrans’ family of services. The “today” baseline is annualized 2013 service levels compared to 2013 costs for the proposed unconstrained services. Once constrained service levels are developed for each fiscal year in the constrained plan, the estimated costs for each year will be developed based on year of introduction.

Each part of the family of services is detailed in their respective sections below.

**10.2 Local Routes**

Omnitrans proposes improvements to local routes in order to allocate resources to the routes with the highest performance levels and opportunities for growth. Routing proposals also looked to remove duplication of service on the same corridors in order to deliver more frequent service. Service design was also modified to improve reliability of service while also working to improve the transfer to high-frequency trunk routes.

Omnitrans utilized regular route performance measures compared to established standards and

the analysis from the COA to develop a series of routing suggestions. Once the plan is constrained by budgetary realities, growth in higher performance areas will need to be offset by reductions in lower performing routes.

**10.2.1 East Valley**

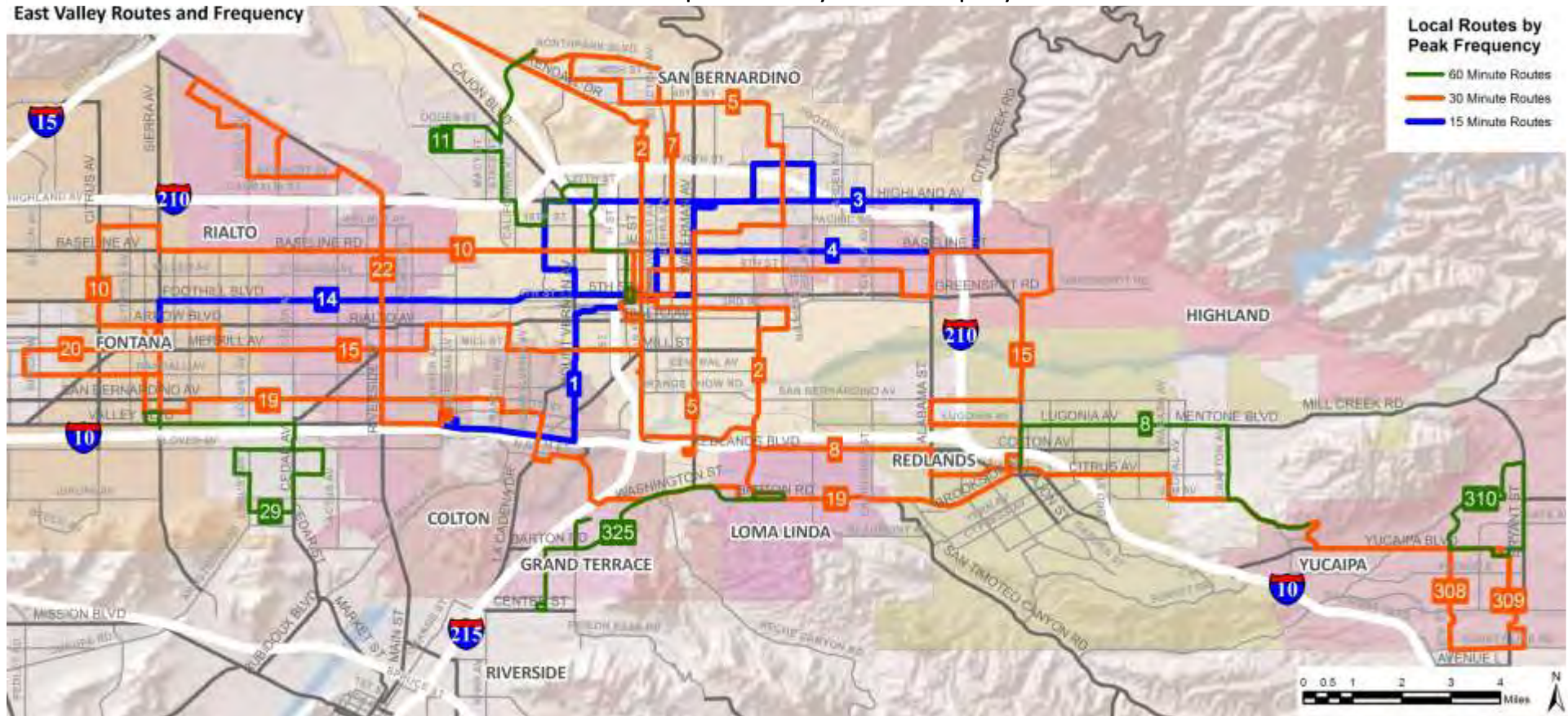
The proposed modifications to local routes in East Valley recognize sbX as the primary north-south transit backbone. Specifically, in the southern sections of the east valley, routes were slightly modified in order to make effective and efficient transfers to the sbX Green Line without the need

to head northward and duplicate travel options that already exist with the sbX Green Line.

Frequency improvements are recommended for Routes 3 & 4 in order to better facilitate connections with sbX and because of their own high productivity compared to standard and compared to other routes.

The other suggestions in east valley were designed to reduce duplication, shorten end of line turn around loops and improve connector ease.

**Exhibit 62: Proposed East Valley Routes and Frequency**



Attachment: City of Chino Appeal Request Form and Supporting Documentation (Appeal of the Draft

## 10.2.1.1 Route 1

Route 1 is a highly productive route with weekday productivity in excess of 35 passengers per hour. Currently the route is broken into a short and a long. The short operates south of downtown San Bernardino at a 15 minute headway. The long operated the entire distance of the route and extends the short with 30 minute service north of Downtown San Bernardino. Key areas served by this route include Downtown San Bernardino, the San Bernardino Metrolink Station, Valley College and Arrowhead Regional Medical Center.

Exhibit 64: Route 1 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	7	4	4
Frequency	15/30	15/30	15/30
Span	04:50-22:49	6:07-21:00	6:07-19:40
Rev. Hours			
Daily	107.48	51.03	45.78
Annual	27,407	2,654	2,381
Annual Total Revenue Hours			32,442

During the OmniConnects timeline, the introduction of SBTC and the First Mile extension of Metrolink will impact this route to a greater extent than any other. The route's peak load occurs typically between the Metrolink Station and Valley College; when the two projects open, Metrolink traffic will be distributed directly to many routes instead of just to Route 1. If it were not for this development, Route 1 would be in consideration for improved frequency on the short leg. As it stands now, continued growth on this route may encourage Omnitrans to consider the deployment of some articulated buses in local service on this Route.

Exhibit 63: Route 1 Map



## 10.2.1.2 Route 2

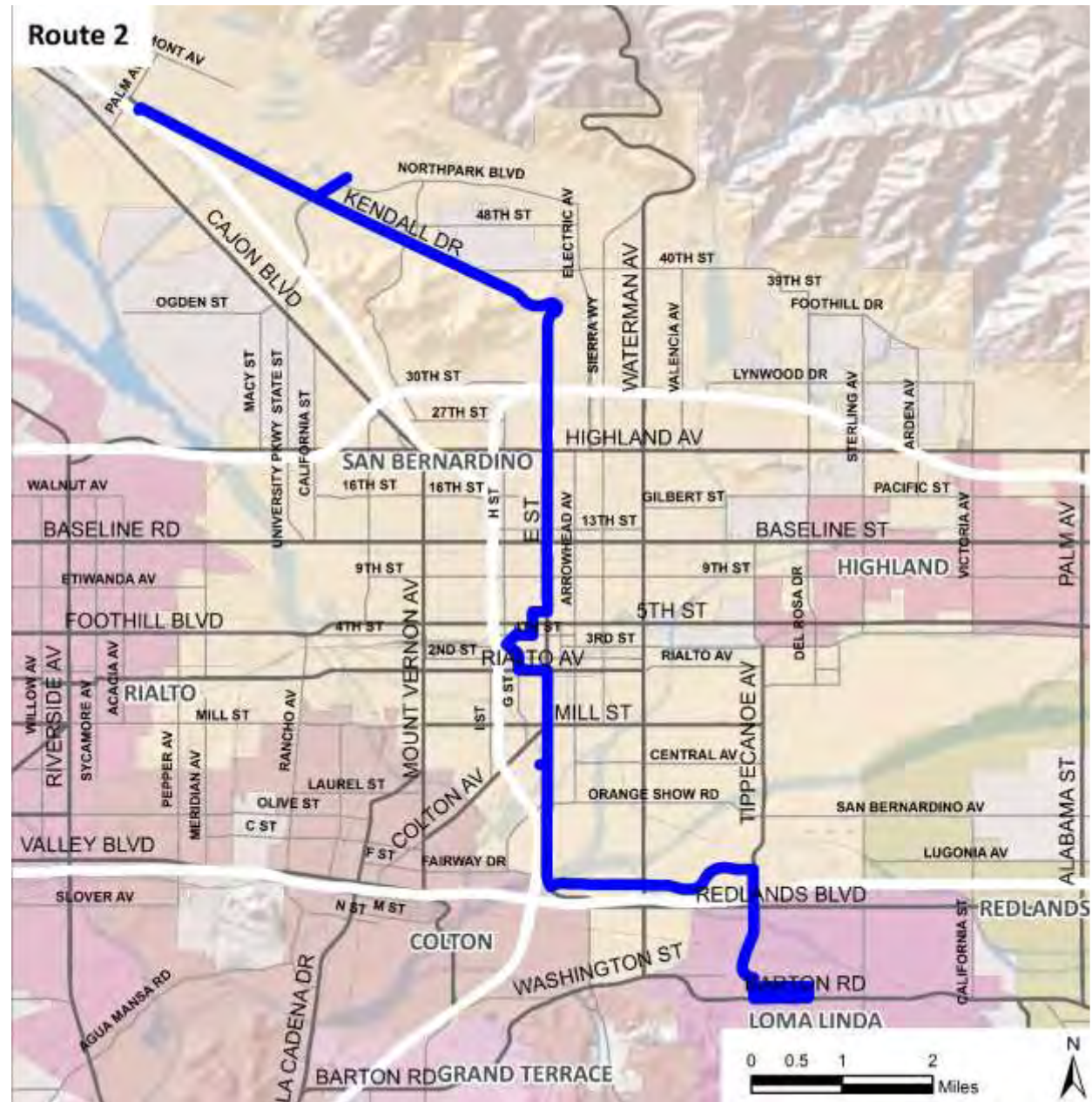
Route 2 has seen the northern end of line extended to Kendall and Palm and the weekday frequency reduced from 15 minutes to 30 minutes as a result of the introduction of the sbX Green Line. Other planned changes to Route 2 are premature at this time and must wait until Omnitrans has had a chance to evaluate the effectiveness of the sbX Green Line and its impact on Route 2.

Should the sbX Green Line warrant the introduction of weekend service or the addition of early morning or late evening service span, Route 2 would be in line for a corresponding decrease in frequency during those periods. sbX's service characteristics are discussed separately.

Exhibit 66: Route 2 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	6	8	8
Frequency	30	15	15
Span	04:30-22:55	06:30-21:24	06:30-19:30
Rev. Hours			
Daily	101.50	111.20	96.00
Annual	25,883	5,782	4,992
Annual Total Revenue Hours	36,657		

Exhibit 65: Route 2 Map



### 10.2.1.3 Routes 3 & 4

Route 3 & 4 are two route numbers but they are effectively one loop route with Route 3 operating counterclockwise and route 4 operating clockwise.

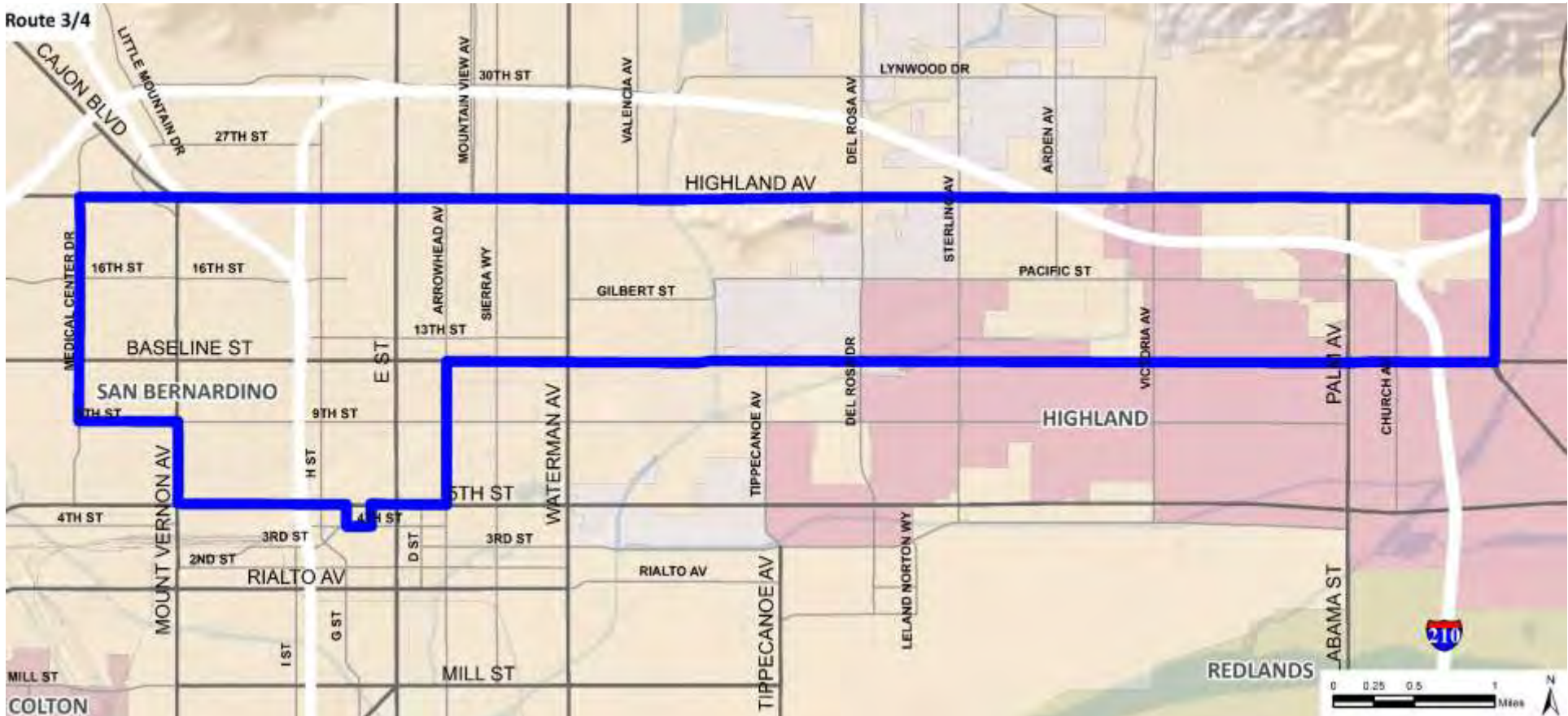
Route 3 & 4 currently operate at a 20 minute headway before noon and a fifteen minute headway afternoon. The two routes both have weekday productivity in excess of 35 passengers per hour; however, the routes often suffer from poor on-time performance typically just at or below 80%. The route is expected to be a

significant east-west feeder route into sbX. Because of these factors, Omnitrans recommends adding one additional peak vehicle to each route, which will allow for a frequency improvement in the morning and an improvement in on-time performance all day. This increase is recommended in an unconstrained environment and is recommended even if it requires finding savings on another route and allocating the resources to Routes 3 & 4.

Exhibit 68: Routes 3/4 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	14	10	10
Frequency	15	15	15
Span	4:32-23:13	6:04-20:54	6:09-19:24
Rev. Hours			
Daily	163.70	128.11	114.32
Annual	41,744	6,661	5,944
Annual Total Revenue Hours	54,349		

Exhibit 67: Routes 3 & 4 Map





## 10.2.1.4 Route 5

Route 5 is a route that meets productivity standards but has consistently suffered from on-time challenges. As a parallel route to sbX, the route may see some ridership shifts to sbX, particularly from those travelling near CSUSB to downtown San Bernardino.

Since the last SRTP, route 5 has seen its headway slip from 30 minutes to 35 minutes in order to improve upon its on-time performance. Omnitrans has also received several requests to improve and straighten travel along Waterman Avenue as a parallel grid route with the sbX Green Line serving as the other main north-south route on E Street. The route used to “meander” as a coverage route south of Gilbert on Waterman, and much of this area is already covered by other routes. This new alignment has been made faster and more productive by going straight along Waterman south of the freeway to Colony Park, south of Redlands Boulevard to Caroline and Club Center Drive. This is in order to absorb and cover that portion of Route 9 which will be given up when it is combined to form the new Route 19.

Exhibit 70: Route 5 Map

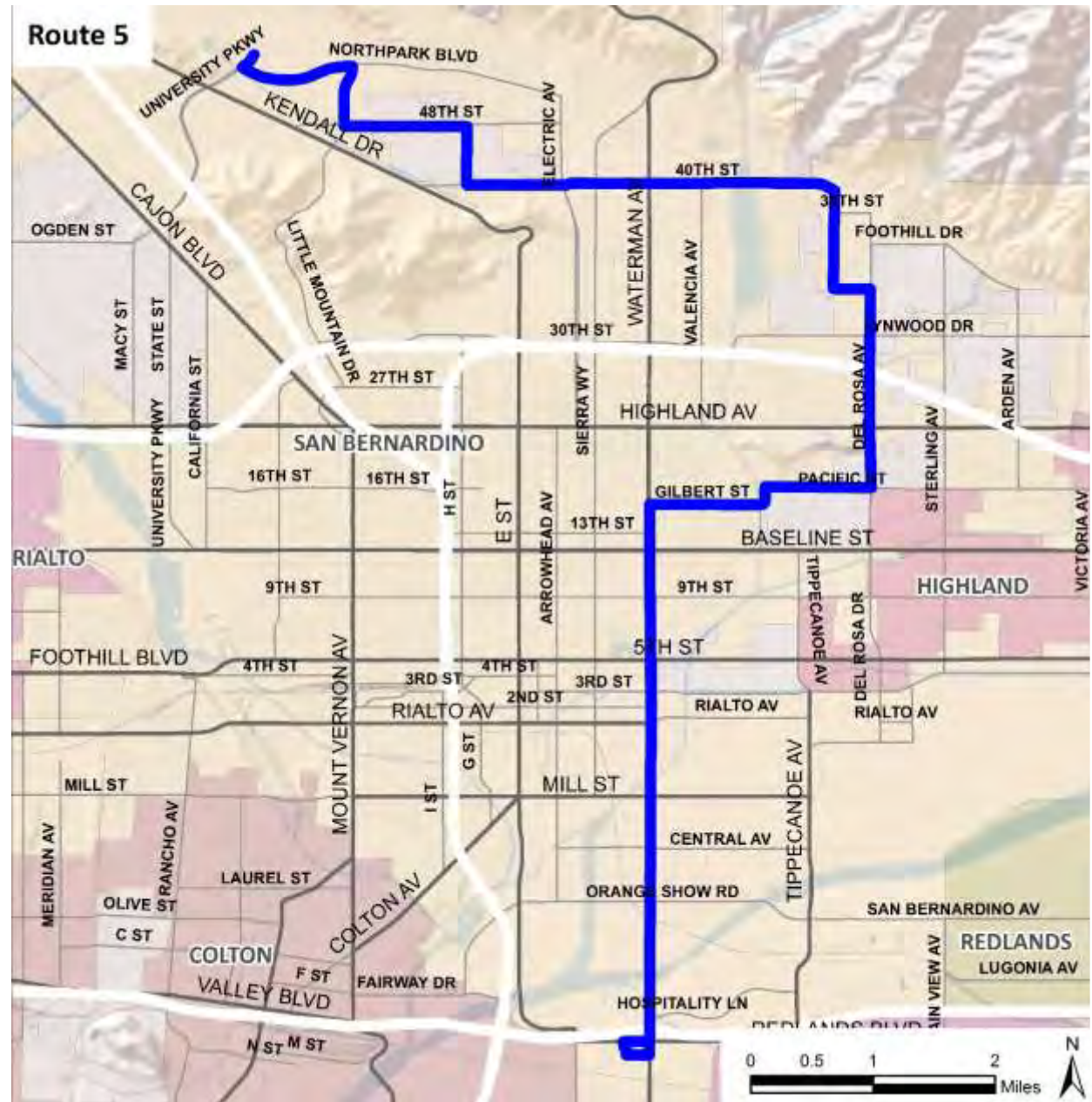


Exhibit 69: Route 5 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	5	3	3
Frequency	30	30	30
Span	4:51-22:23	6:48-21:34	6:33-19:34
Rev. Hours			
Daily	81.37	42.30	37.05
Annual	20,825	2,200	1,927
Annual Total Revenue Hours	24,951		

## 10.2.1.5 Route 7

Route 7 meets but does not exceed productivity and farebox recovery standards. The route currently exceeds the 90% on-time performance goal. As a result, no additional resources are recommended to be allocated to Route 7.

Compared to service exiting in January 2014, Route 7's terminus is moving from Kendall and Palm to CSUSB as approved in the FY2013 Service Element. Route 7 terminus is moved as a result of the extension of Route 2 to cover much of the same area and the introduction of sbX to the Kendall and Palm Station. This shift saves one vehicle compared to status quo FY2013 which will be used to improve service elsewhere.

Exhibit 72: Route 7 Map



Exhibit 71: Route 7 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	3	2	2
Frequency	30	60	60
Span	6:13-19:52	7:16-18:48	8:08-17:58
Rev. Hours			
Daily	38.95	21.07	17.67
Annual	9,932	1,095	919
Annual Total Revenue Hours	11,946		

## 10.2.1.6 Route 8

Currently, routes 8, 9, and 19 share various segments of the east-west corridors between Yucaipa, Redlands and Loma Linda. Through most of these cities two of these three routes serve Yucaipa Boulevard, Redlands Boulevard and Barton Avenue depending on the specific segment. Route 8 and Route 9 are currently 60 minute routes with offset clock headways such that if one route arrives at the top of the hour the other route arrives at the bottom of the hour. While this makes sense to transit experts, it can be confusing

to newcomers. It is proposed to split this route into two portions: 8 Long, and 8 Short; 8 Short will have its frequency increased to 30-minutes and will serve two important endpoints: Redlands Transit Center, and the 4<sup>th</sup> Street Downtown Transfer Center. For the less productive 8 East section, frequency will remain at 60 minutes, and will serve both the high school and Crafton Hills College.

Exhibit 74: Route 8 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	5	3	2
Frequency	60/30	30	60
Span	4:50-21:17	6:43-19:22	8:05-19:00
Rev. Hours			
Daily	46.35	34.95	29.75
Annual	11,820	1,818	1,547
Annual Total Revenue Hours			15,183

Aligning resources along Barton and Redland

Exhibit 73: Route 8 Map



Boulevard, while maintaining the existing level of service on Yucaipa Boulevard, will help develop two stronger east-west transfer connections on the southern end of the sbX Green Line.

Additionally, Route 8 has seen particularly strong growth in ridership following the elimination of high school bus service in Redlands Unified School District. As a result an extra bus in the morning and afternoon has been deployed to alleviate over-crowding of this hourly route.

As part of a broad level change, Omnitrans recommends developing a Route 8 Short between downtown San Bernardino and Redlands Mall and a Route 8 Long that extends the Route 8 Short to Crafton Hills College. This shifts the service on Redlands Boulevard from a share between Route 8 and Route 19 to one that is focused just on Route 8. The segment of Route 8 that is on Yucaipa Boulevard would be covered by a frequency improvement to Route 9.

Collectively, the proposed changes to Route 8, 9 and 19, eliminate duplication of service in some areas in order to improve one of the routes in each area. As a result, Route 8 does see an increase in resources, but this is offset by a decrease in resources contributed to the combined 8 & 9

### **10.2.1.7 Route 9**

Route 9 is a well-performing 60 minute route that suffers from poor on-time performance and its productivity is offset because other routes share key corridor segments along Yucaipa Boulevard and Barton Avenue.

Omnitrans recommends the elimination of the designation Route 9, with the service subsumed into a newly extended Route 19. The net result of this is the area served by Route 9 will see an increase in service frequency coinciding with route 19s peak 30 minute service. The new route 19 would allow riders that used to be only able to reach as far east as San Bernardino with a one seat ride to now reach Fontana. Additionally, because of the speed and frequency of sbX, Route 9 riders that previously had a direct ride into San Bernardino, will be able to make the trip with a transfer to sbX at the VA Hospital slightly faster than they can today.

This route is proposed to combine elements of Route 9 and Route 19 in order to provide a continuous trip from Yucaipa to Fontana Metrolink station without need for transfers. This makes for a longer route, but one with numerous advantages. It connects Redlands and Loma Linda to sbX, and has important stops at both the VA Hospital at Loma Linda and at ARMC in Colton.

The net result of this consolidation of Route 9 and 19, saves one vehicle all day and one additional peak vehicle that goes to Redlands High School to alleviate overcrowding of the bus. With the improved frequency, overcrowding will be less of an issue. And the improved frequency from 60 minutes to 30 minutes means that if an overcrowding event occurs, the passenger cost in terms of time is not as high.

Route 19 is described separately in its own section.

## 10.2.1.8 Route 10

Route 10 is a moderately productive route which has seen productivity over all days average between 24 and 29 passengers per hour.

Farebox recovery ratios have fluctuated around 25% for all days for the last six months, and have always exceeded 20% for weekdays and nearly always exceeded 20% every month for Saturdays. Due to this level of productivity and its meeting of standards overall, no change to Route 10 has been

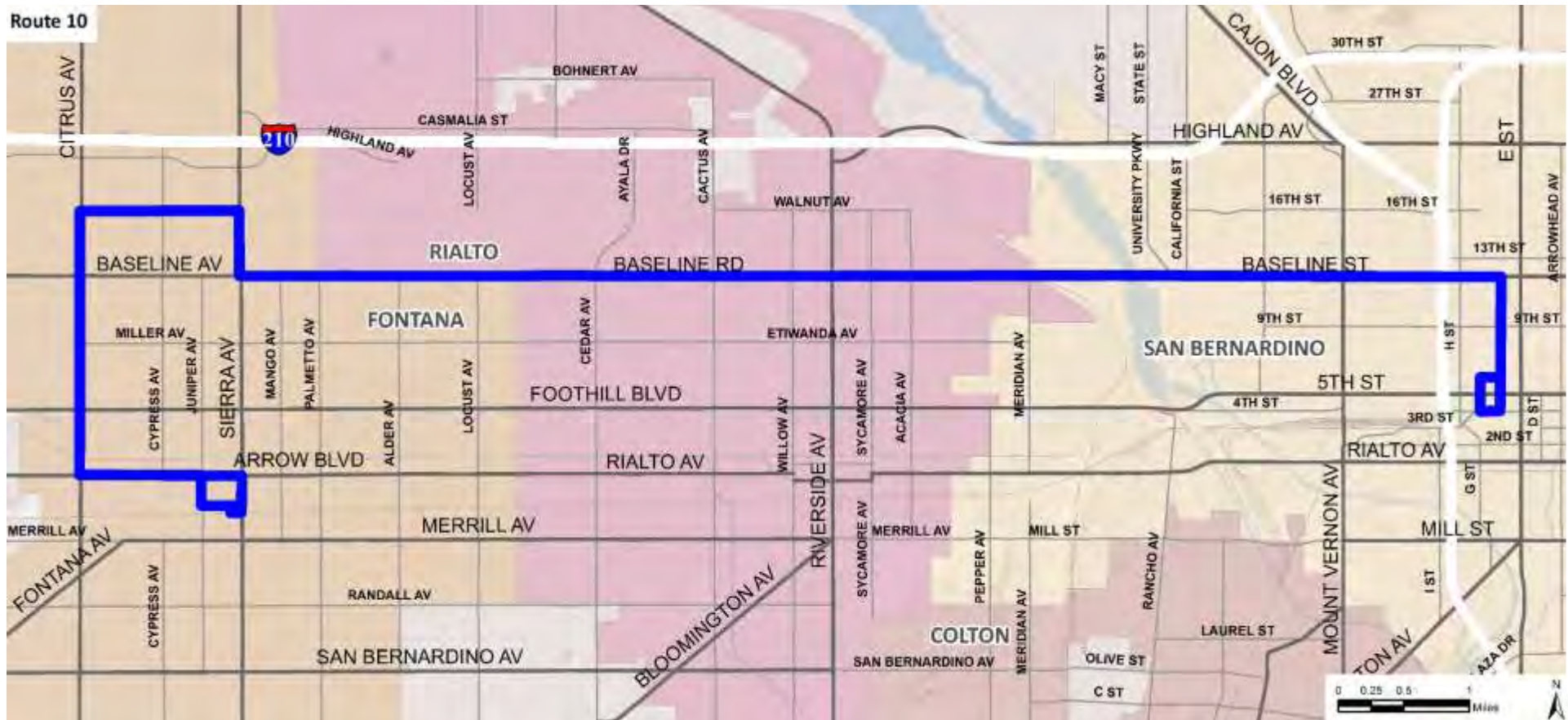
recommended within OmniConnects.

Moving forward, Route 10's mid-day service levels should continue to be evaluated. The route sees a frequency reduction to hourly between 10:00 A.M. and 2:00 P.M.. While the data does not support improving frequency during this time period, an increase in this period is a common rider request.

Exhibit 76: Route 10 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	4	2	2
Frequency	30	60	60
Span	5:10-20:18	6:20-19:25	7:20-18:18
Rev. Hours			
Daily	44.9	25.87	21.65
Annual	11,450	1,345	1,126
Annual Total Revenue Hours			13,921

Exhibit 75: Route 10 Map



## 10.2.1.9 Route 11

Route 11 is primarily a coverage route and it provides lifeline service to the unincorporated area of Muscoy. The route takes a circuitous route to maximize the coverage. The route serves one of the highest-propensities of low-income and minority riders in Omnitrans' service area.

The route may become a feeder route to sbX at Cal State San Bernardino. It will continue to be evaluated, but there are no recommended changes to this route in the unconstrained plan.

Exhibit 78: Route 11 Map

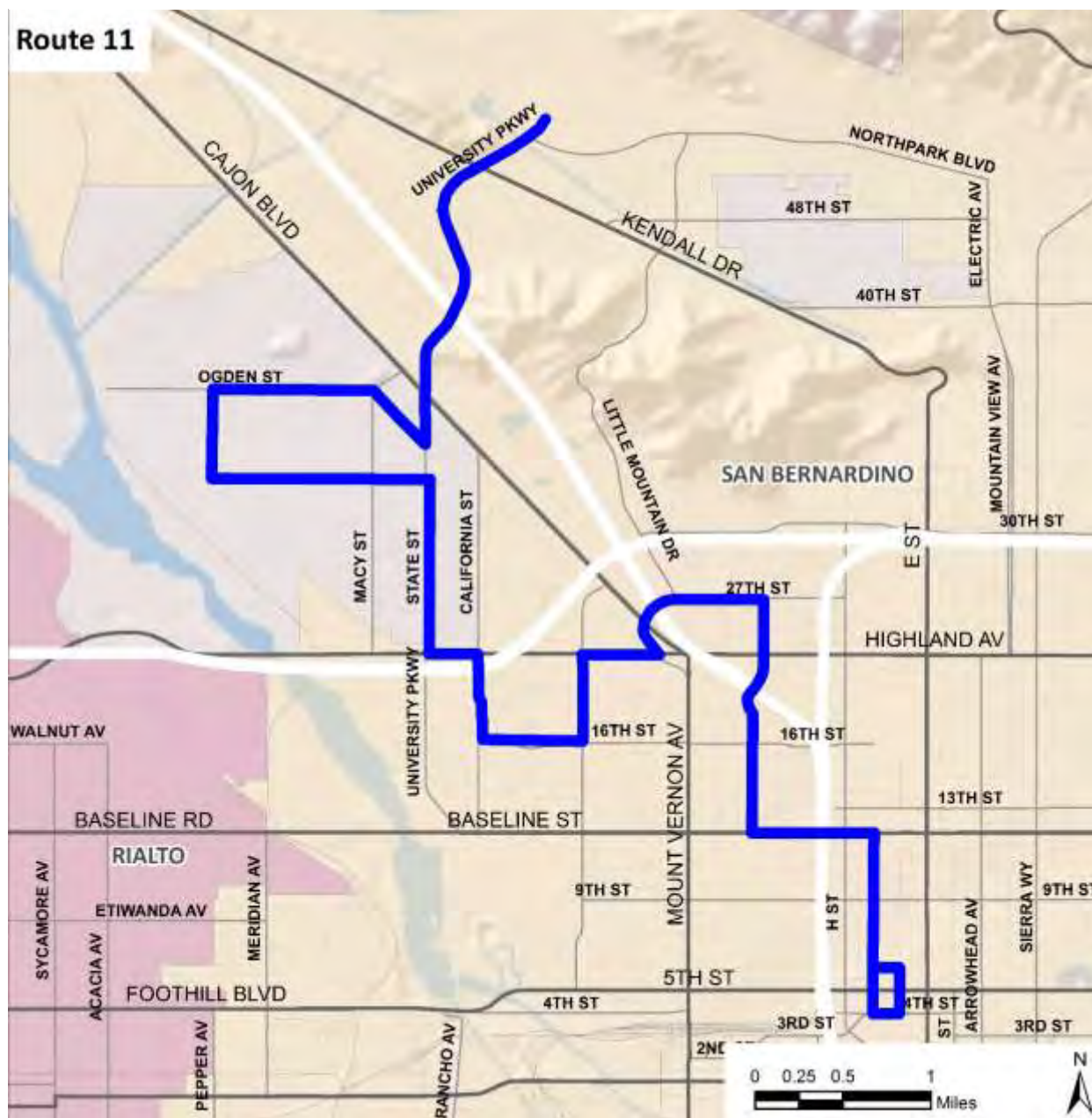


Exhibit 77: Route 11 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	3	2	2
Frequency	60	60	60
Span	5:28-22:17	6:50-18:44	7:17-19:22
Rev. Hours			
Daily	36.1	21.77	22.81
Annual	9,206	1,132	1,186
Annual Total Revenue Hours	11,524		

### 10.2.1.10 Route 14

Route 14 exceeds standards for Passengers per Hour productivity and for Farebox recovery for all days.

Route 14 is one of Omnitrans most productive routes with passengers per hour score of over 35 passengers per hour. During peak periods the route often experiences standing loads, but the loads do not typically exceed Omnitrans' loading standard.

Route 14 is the Central portion of the Foothill Corridor which was studied as a BRT Corridor.

There is no plan to modify the Route 14 in the unconstrained plan, but that is because the route is addressed in the future BRT section of the unconstrained plan.

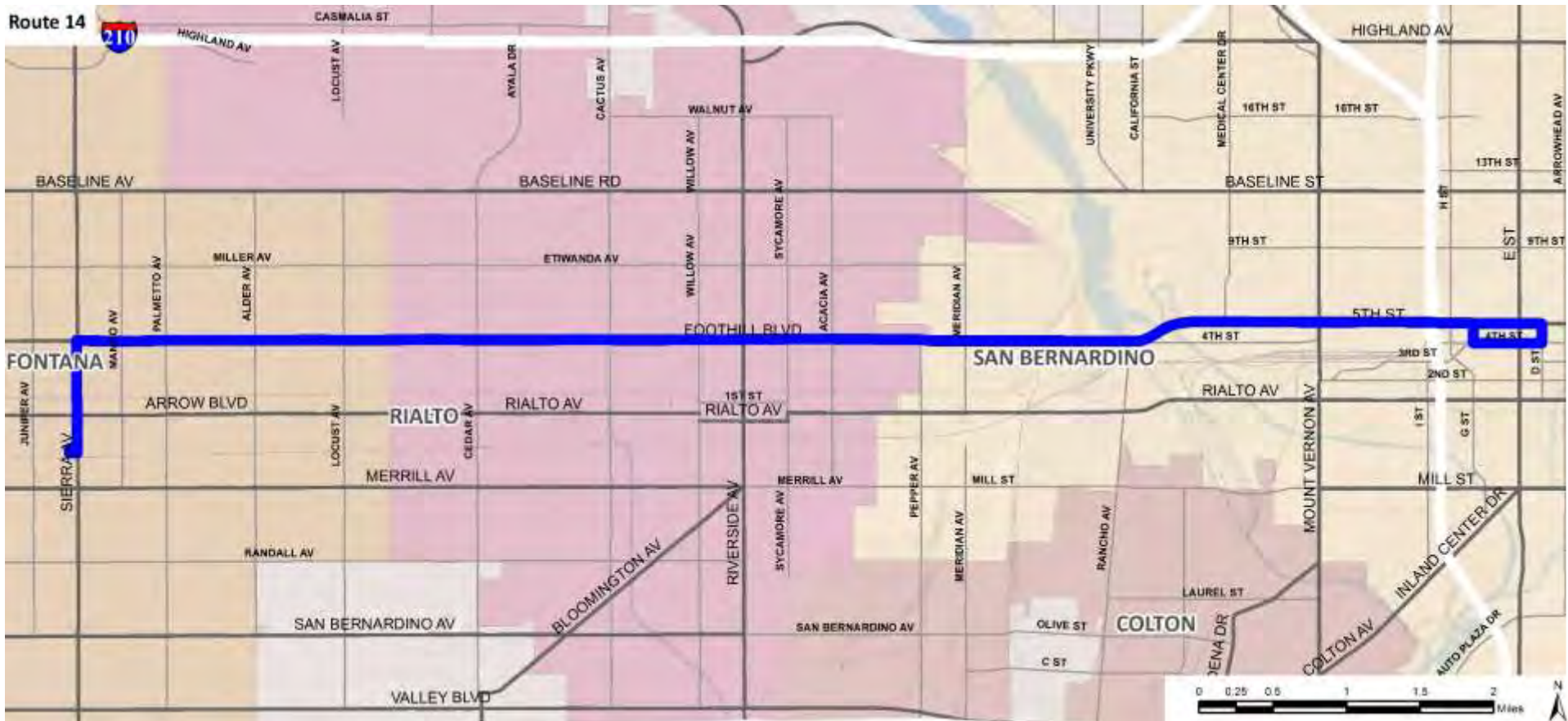
If Route 14 continues to see growth and funding is not found to develop a BRT or a limited stop-rapid route, the route may be in line for usage of articulated buses on the local route by the end of

the OmniConnects' planning horizon.

Exhibit 80: Route 14 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	8	7	7
Frequency	15	15	15
Span	3:48-23:09	6:05-22:28	6:05-19:24
Rev. Hours			
Daily	103.38	83.96	76.78
Annual	26,362	4,366	3,993
Annual Total Revenue Hours			34,721

Exhibit 79: Route 14 Map



### 10.2.1.11 Route 15

Route 15 meets productivity standards and provides a key east-west connection between Redlands, Highland, San Bernardino, Rialto and Fontana. The route is expected to see growth as a feeder route to sbX.

As the route meets standards, there are no proposed changes for the route with in this plan.

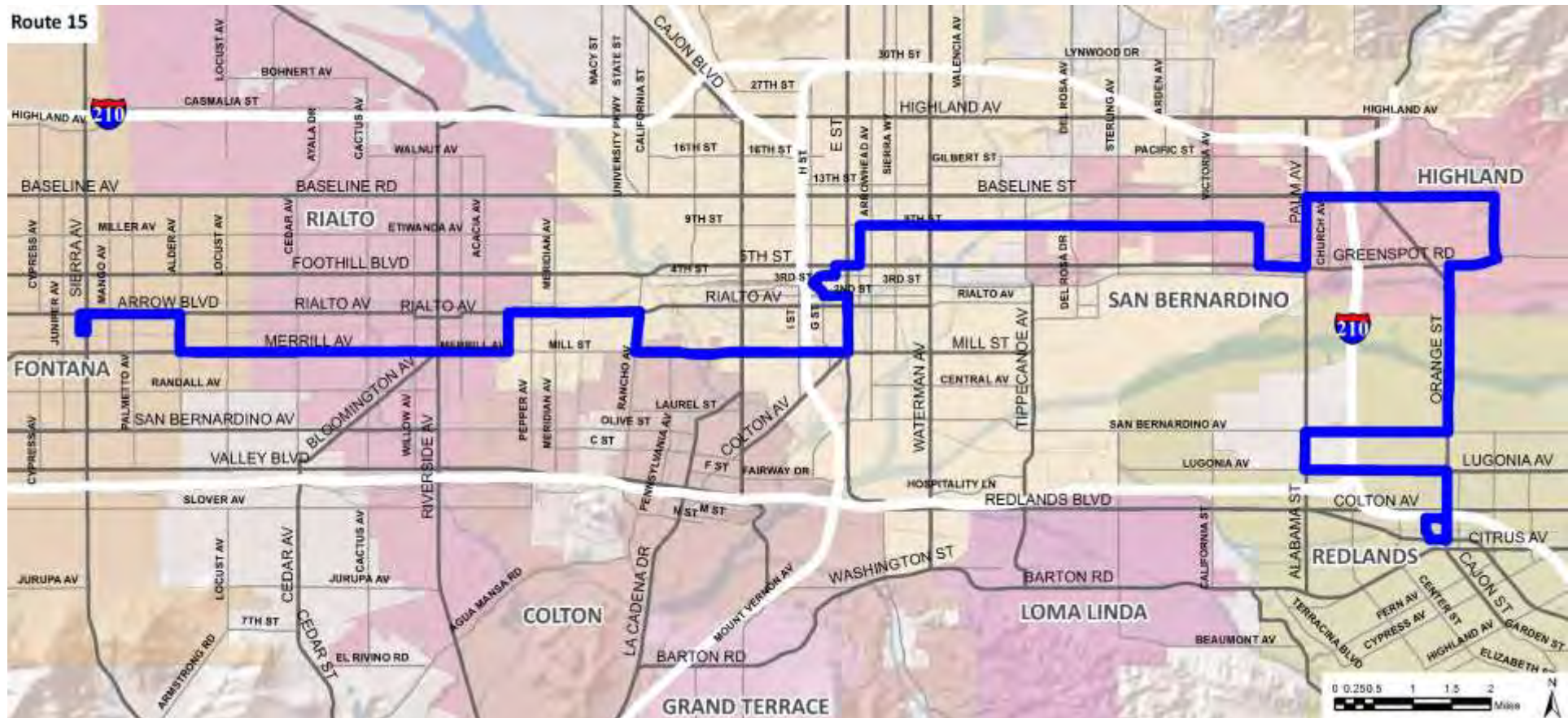
Moving forward, the most necessary change to Route 15 is removing many of the twists and turns.

Should a new service be developed in Redlands, particularly following the introduction of Redlands Rail, Omnitrans should continue straight lining the route so that it stays on Orange Street rather than deviating on San Bernardino Avenue and Lugonia Avenue. This would not be recommended until another service is available to serve the Citrus Plaza shopping center.

Exhibit 82: Route 15 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	8	4	4
Frequency	30	60	60
Span	5:15-22:39	7:14-19:32	6:37-19:32
Rev. Hours			
Daily	117.9	45.98	44.42
Annual	30,065	2,391	2,310
Annual Total Revenue Hours	34,766		

Exhibit 81: Route 15 Map





### 10.2.1.12 Route 19

With the elimination of Route 9, the new Route 19 will combine elements of Route 9 and the old Route 19 in order to provide a continuous trip from Yucaipa to Fontana Metrolink station without need for transfers. This makes for an extended route, but has numerous advantages: it will connect Redlands and Loma Linda to sbX, and provides important stops at both the VA Hospital and Loma Linda and at ARMC in Colton. An important consideration, however, will be the impact a route of this length would have on Access

fares, as it will traverse four fare zones. This will necessitate an accompanying revision to the boundaries of our Access fare zones.

Exhibit 83: Route 19 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	9	9	5
Frequency	30	30	30
Span	4:50-22:30	5:58-19:35	6:15-19:00
Rev. Hours			
Daily	139.00	102.55	57.75
Annual	35,445	5,333	3,003
Annual Total Revenue Hours	43,781		

Exhibit 84: Route 19 Map



Attachment: City of Chino Appeal Request Form and Supporting Documentation (Appeal of the Draft

### 10.2.1.13 Route 20

Route 20 is currently the lowest performing of all 30-minute fixed routes. It is proposed that its frequency of service be reduced from 30 minutes to 60-minute service in order to more effectively deploy Omnitrans resources.

Several route configurations have been considered. Should the proposal move forward, Omnitrans may consider interlining routes 20 and 29 now that they are both on the same 60 minute frequency. This would allow riders a greater

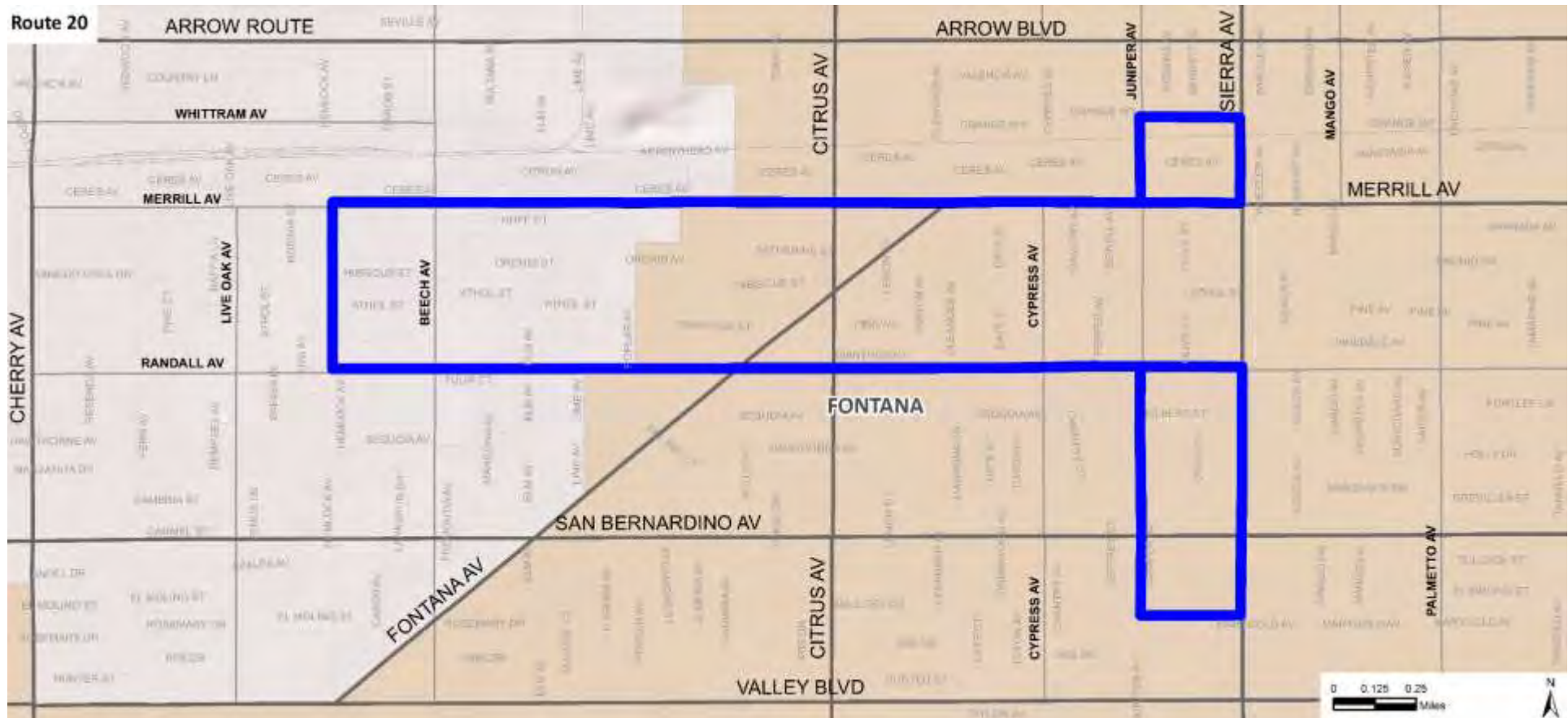
expansion to travel rather than the smaller route that exists today.

If the West Valley Connector route moves forward, route 20 may be in line for a complete restructuring to take advantage of the higher quality of service on Sierra and potential changes to service on San Bernardino Avenue. While these suggestions are proposed for future consideration, the only proposal in OmniConnects is the reduction in service frequency.

Exhibit 86: Route 20 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	1	1	1
Frequency	60	60	60
Span	4:51-21:41	6:26-18:26	6:56-17:56
Rev. Hours			
Daily	16.83	12.00	11.00
Annual	4,293	624	572
Annual Total Revenue Hours	5,489		

Exhibit 85: Route 20 Map



## 10.2.1.14 Route 22

The OmniConnects proposal for Route 22 remains largely unchanged from its current status. Signal improvements at Arrowhead Regional Medical Center allow for more direct routing at the southern end-of-line and as a result the route is proposed to approach and depart from ARMC in the same way.

A small section of the southern turnaround loop on San Bernardino Avenue is left by this proposed change; however, the area is served by the current Route 19 and will still be served by the proposed Route 19.

Exhibit 87: Route 22 Map

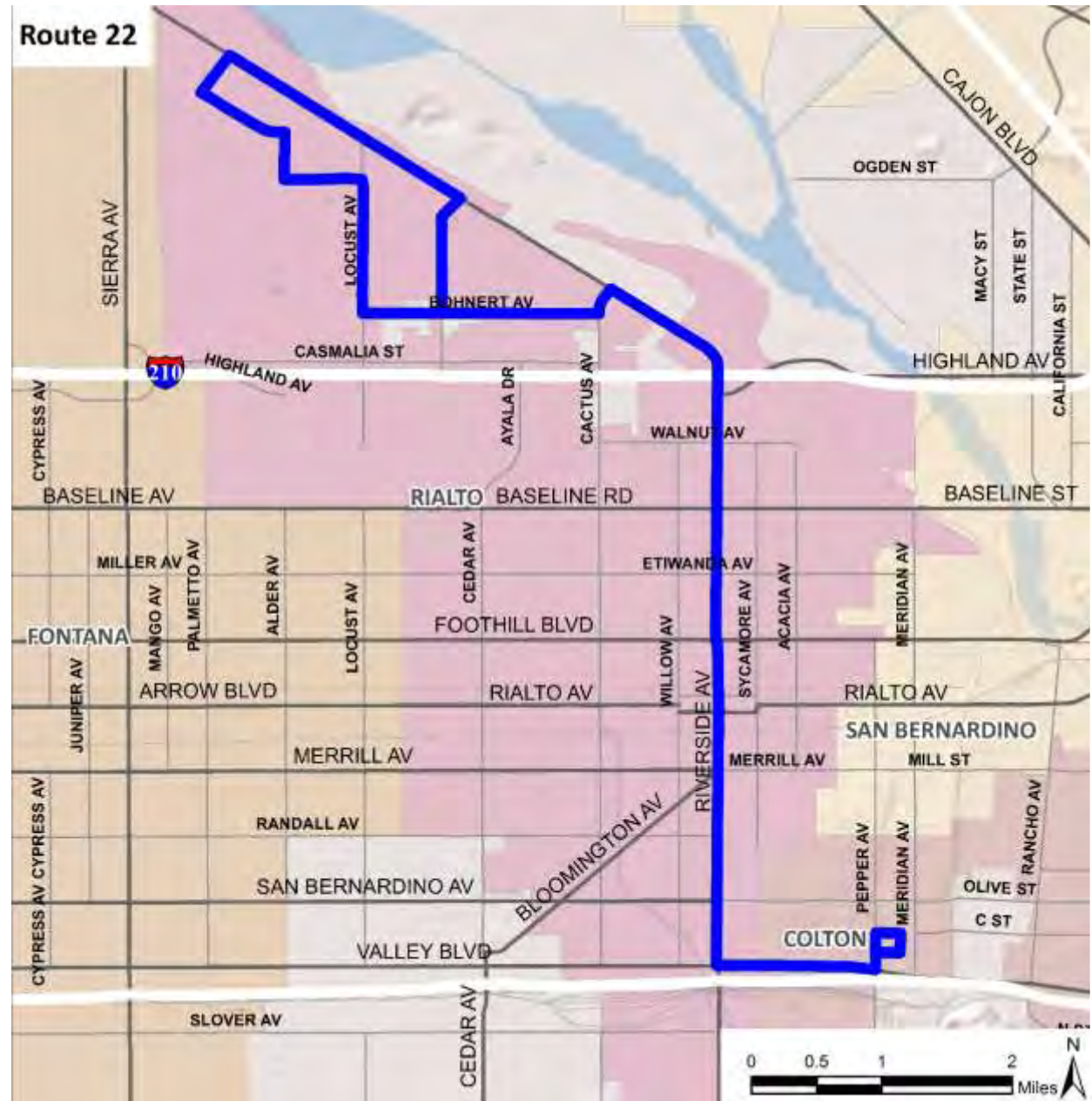


Exhibit 88: Route 22 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	4	2	2
Frequency	30	60	60
Span	5:00-22:23	7:35-18:59	6:35-19:35
Rev. Hours			
Daily	65.53	20.80	24.00
Annual	16,711	1,082	1,248
Annual Total Revenue Hours	19,041		

## 10.2.1.15 Route 29

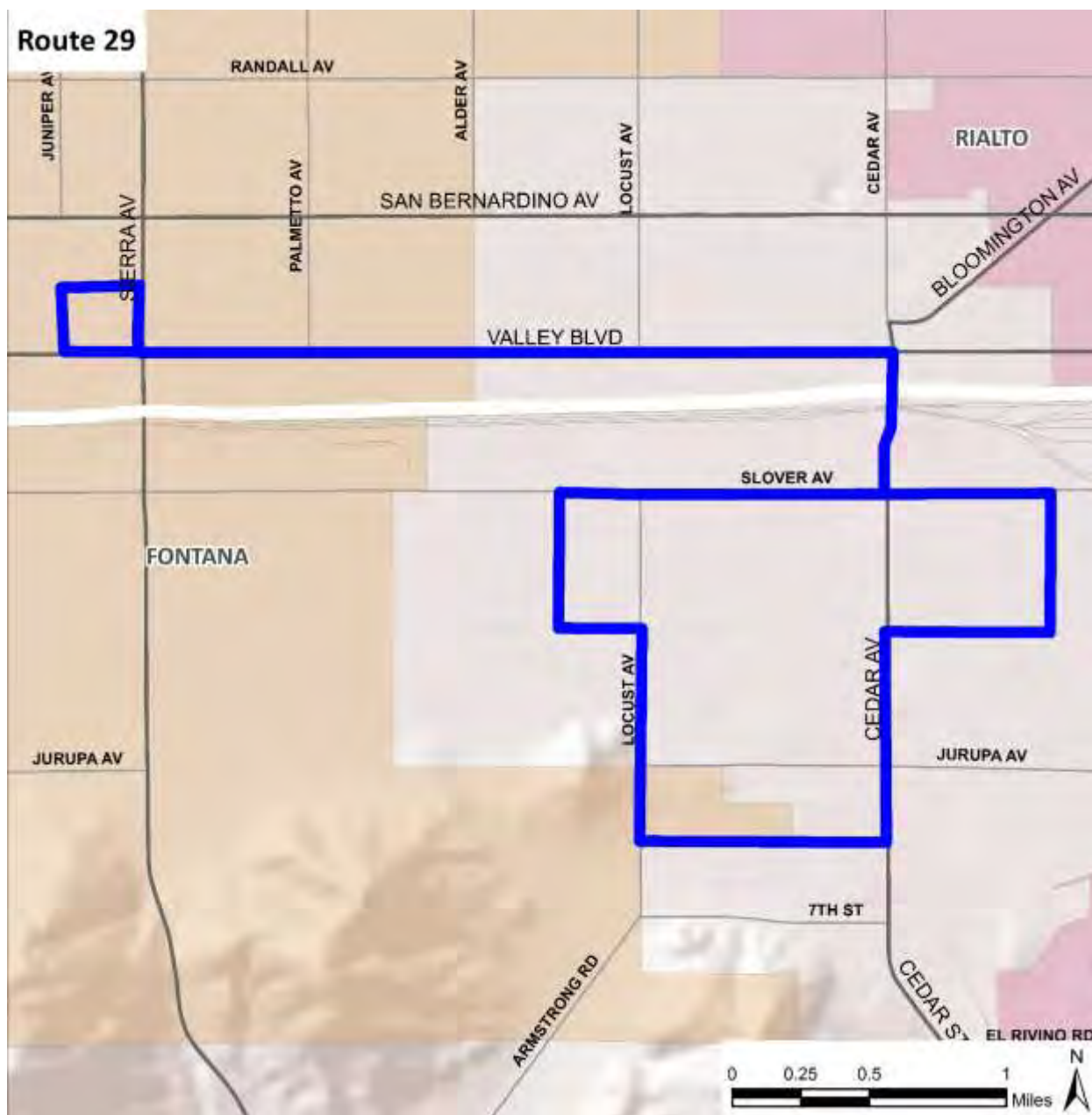
Route 29 is a historically low performer in terms of passengers per hour and farebox recovery ratio. However, the route serves a key lifeline function for the community of Bloomington with connections to the Kaiser Hospital and the South Fontana Transfer Center. The route already has the lowest acceptable service frequency, no Sunday service, and a small 16 passenger cutaway on Saturday.

Given that the route provides the only service to the community of Bloomington, there is not recommended service change at this time. Should the route continue to underperform, Omnitrans should consider turning the route into an OmniGo route to use cutaway vehicles on the route at all times. This is not recommended at this point because of two high school trips.

Exhibit 90: Route 29 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	1	1	NA
Frequency	60	60	NA
Span	6:45-18:35	7:45-18:35	NA
Rev. Hours			
Daily	11.83	10.83	NA
Annual	3,018	563	NA
Annual Total Revenue Hours	3,581		

Exhibit 89: Route 29 Map



## 10.2.1.16 OmniGo Yucaipa: Routes 308, 309 & 310

OmniGo Yucaipa has greatly improved service in Yucaipa compared to the previously existing OmniLink Service. Ridership in the community has more than doubled.

Overall, Farebox recovery rates for OmniGo Yucaipa continue to hover around 10%, making the service a low performer, but the routes continue to see double-digit ridership growth even three years after introduction.

Within OmniConnects, Omnitrans proposes no changes to OmniGo Yucaipa. Instead, an evaluation of OmniLink service in Yucaipa is warranted due to the duplicative nature of OmniGo and OmniLink.

Exhibit 92: OmniGo Yucaipa Maps (Routes 308, 309 310)

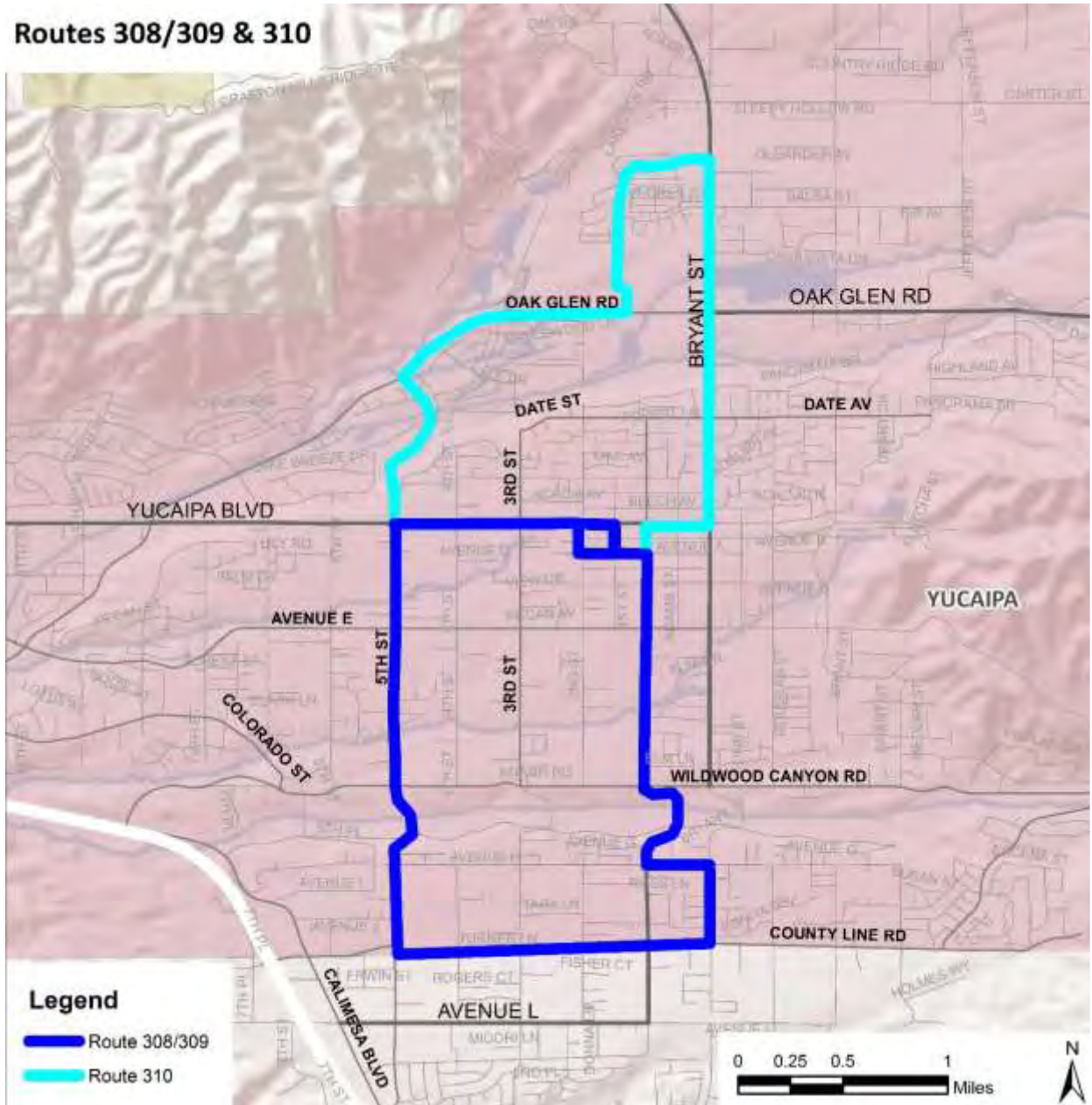


Exhibit 91: Routes 308, 309 & 310 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	3	2	1
Frequency	30/60	30/NA	60/NA
Span	6:00-20:55	7:00-20:25	7:30-18:39
Rev. Hours			
Daily	31.32	26.84	11.15
Annual	7,987	1,396	580
Annual Total Revenue Hours	9,962		

## 10.2.1.17 OmniGo Grand Terrace: Route 325

Ridership for Route 325 has increased nearly every month over last year, as has its farebox recovery. At this time, there are no recommendations to change Route 325 in the Unconstrained Plan.

Exhibit 93: Route 325 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	1	1	1
Frequency	70	70	70
Span	5:08-20:22	7:17-18:14	8:27-18:14
Rev. Hours			
Daily	15.23	10.95	9.78
Annual	3,884	569	509
Annual Total Revenue Hours	4,962		

## 10.2.1.18 Other Areas for Consideration

Within East Valley, there are three primary areas where service is frequently requested; however, Omnitrans does not have the additional resources to provide service at this time. These areas are:

- ▶ San Manuel Indian Bingo and Casino;
- ▶ Redlands Community Hospital, and,
- ▶ Lugonia Avenue between Alabama Ave. and Mt. View Ave.

Omnitrans will continue to evaluate these areas, but does not propose service at this time.

Omnitrans has not addressed the planned introduction of Redlands Rail in 2018 in the current routing plan, but will do so in the next SRTP update.

Exhibit 94: OmniGo Grand Terrace (Route 325)



## 10.2.2 West Valley

The proposed changes in West Valley are designed to improve travel directness, travel times, and the ease of understanding of Omnitrans system of local bus routes, especially for new riders. This is accomplished while also reducing areas of route overlap in order to minimize service duplication.

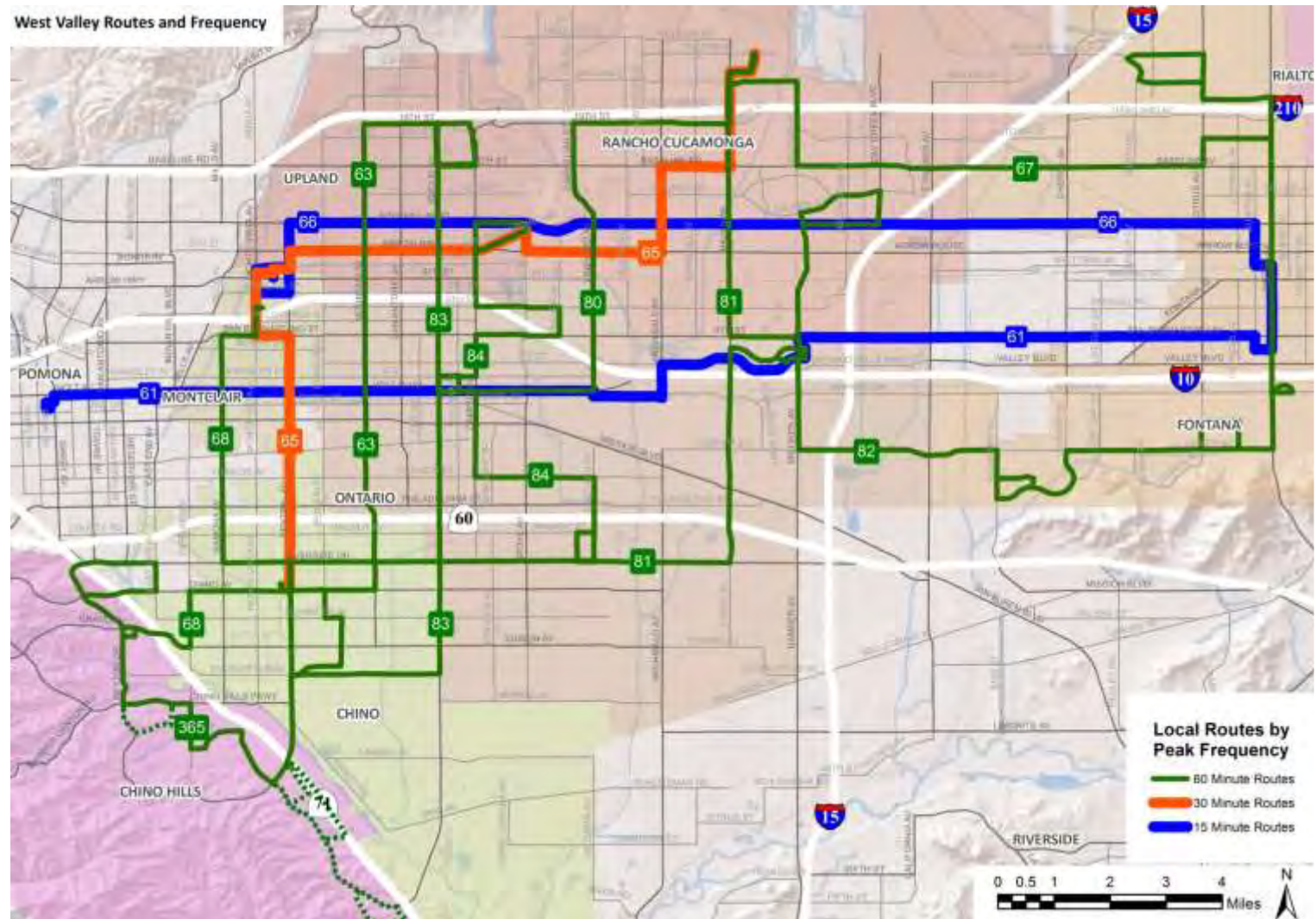
At first glance, the proposal shifts West Valley towards more of a grid based system where the primary north-south routes are made more direct generally focusing on one key corridor. This mimics the way that people are inclined to drive. While the grid becomes clear in Exhibit 95, the system remains largely hub-and spoke based. Nearly every route stops at two transfer centers and provides connection to the areas in between. The exception to this is route 63, which becomes a route focused exclusively on Mountain Avenue, without deviating to Montclair Transit Center. While this does deviate from a true hub and spoke design, the route does provide an easy transfer to Route 66 to reach the Transit Center.

The desired outcome of the proposed routing is a more

efficient service delivery that focuses ridership on the core high-frequency east-west routes, rather than having the north south route travel at various angles. This should strengthen the east-west routes which will improve ridership and improve the desirability and fundability of limited stop,

rapid or bus rapid transit services in in the future. The route by route details of the West Valley proposals can be seen in the sections below.

Exhibit 95: Proposed West Valley Local Bus Routes and Service Frequency



## 10.2.2.1 Route 61

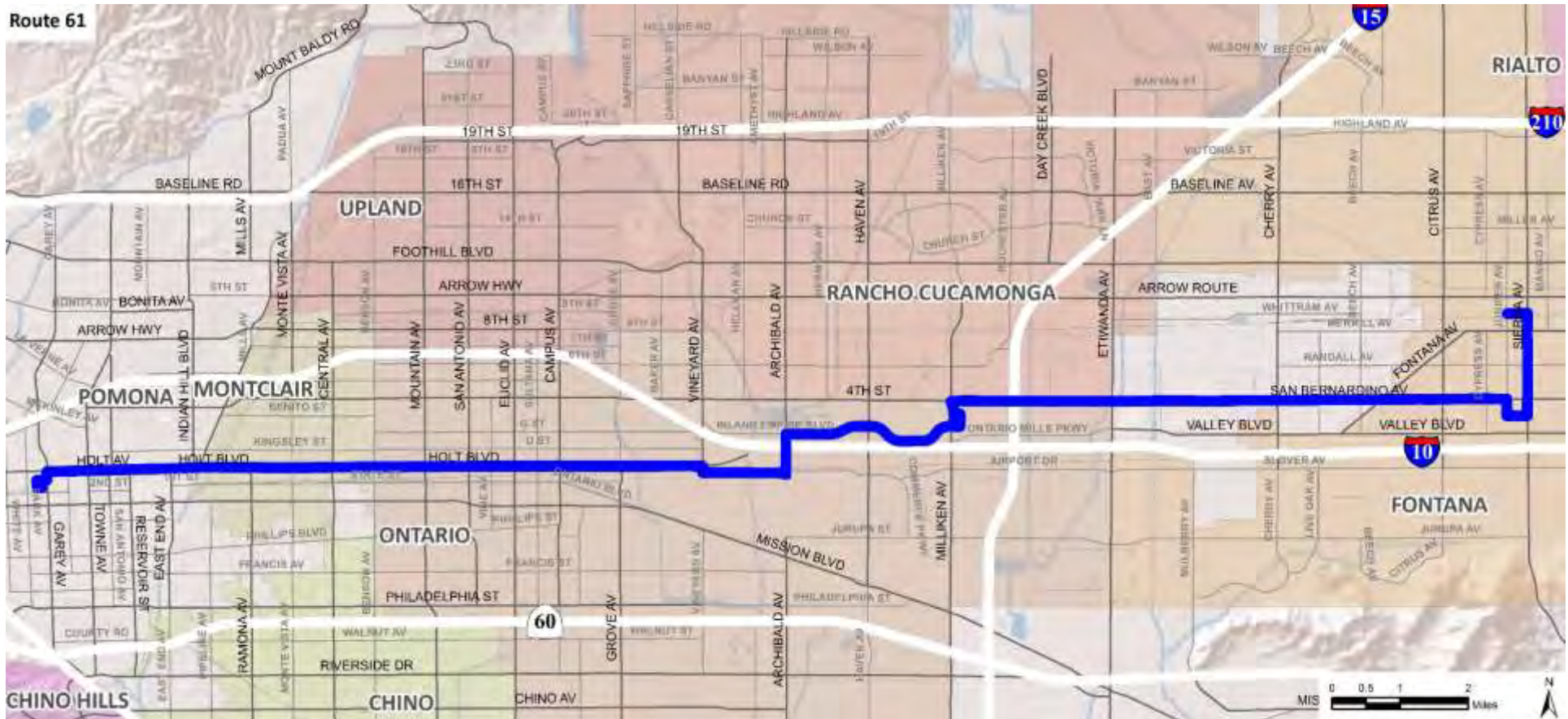
Route 61 is Omnitrans' highest ridership route carrying over 1.8 million passengers per year. The route meets farebox recovery and passengers per hour standards. The route also provides generally direct east-west connections. Within the OmniConnects plan, the route should benefit from the proposed changes to Routes 80 and 63, which would no longer travel as far on Holt Blvd leaving route 61 with higher ridership and also reducing confusion amongst passengers.

The primary change for Route 61 within OmniConnects is the proposal to work towards delivering the West Valley Connector as the next sbX route. This plan is discussed in the future BRT portion of the unconstrained plan. Should the West Valley Connector begin revenue service during the OmniConnects time period, Route 61 would see resources transferred to the West Valley Connector similarly to resources from Route 2 being transferred to sbX upon the startup of service.

Exhibit 96: Route 61 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	14	13	13
Frequency	15	15	15
Span	4:20-23:08	5:55-22:34	6:05-19:49
Rev. Hours			
Daily	197.56	161.78	149.62
Annual	50,378	8,413	7,780
Annual Total Revenue Hours	66,571		

Exhibit 97: Route 61 Map





## 10.2.2.2 Route 63

Omnitrans riders have often requested direct north-south service on Mountain Avenue between Chino, Ontario and Upland. Currently, this trip requires three buses.

The proposed change to Route 63 is to deliver the direct service on Mountain Avenue from Chino Avenue to 19<sup>th</sup> Street to cover an area that is removed from the Route 67 Proposal.

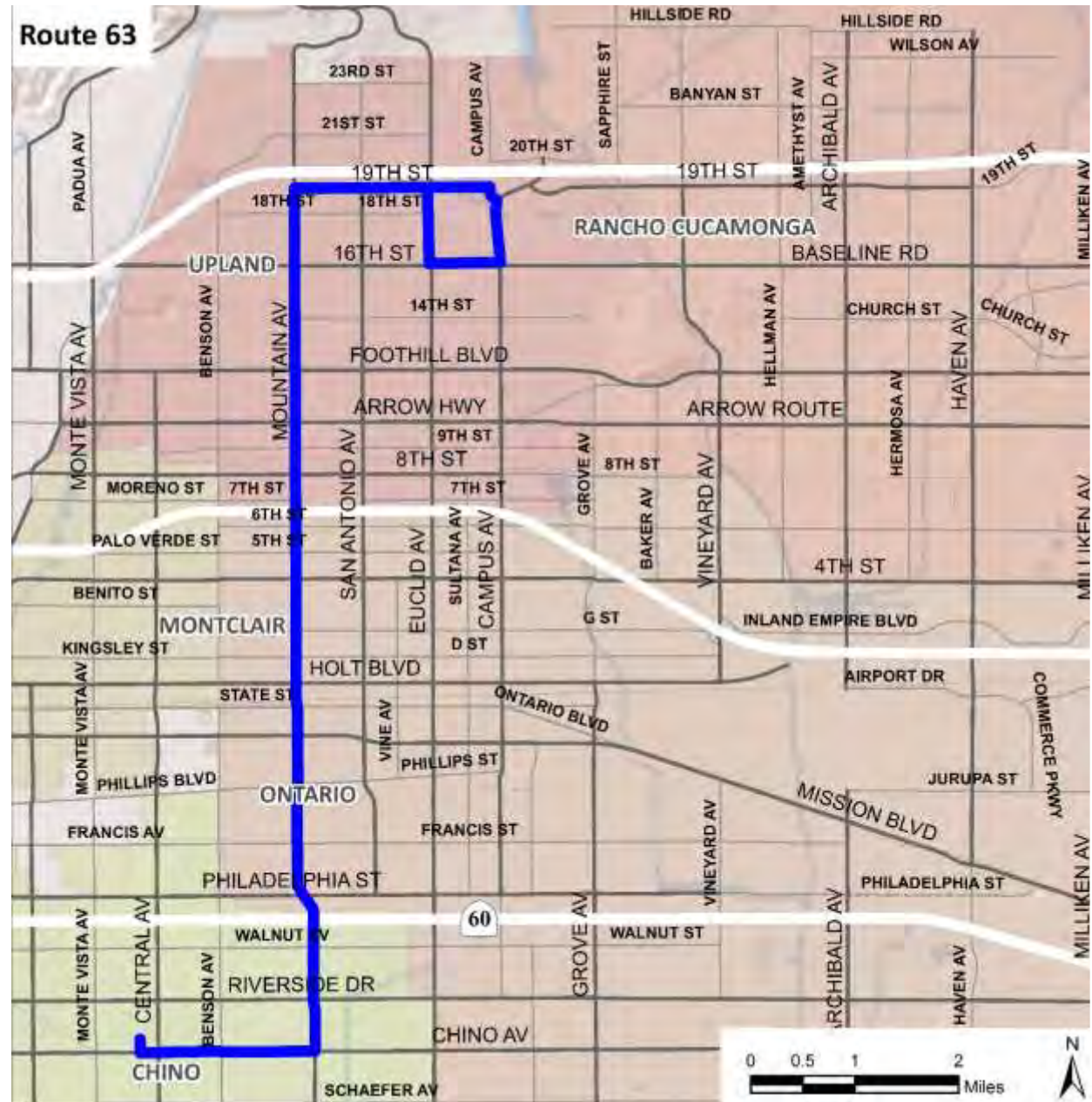
The current portion of Route 63 that serves Campus Avenue and San Antonio Community Hospital is transferred to new proposed Route 84.

By combining these two changes the route no longer travels on Holt Blvd, which eliminates some service duplication on that corridor.

Exhibit 98: Route 63 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	4	4	4
Frequency	60	60	60
Span	5:45-20:36	6:43-18:41	6:38-19:26
Rev. Hours			
Daily	51.40	39.87	43.20
Annual	13,107	2,073	2,246
Annual Total Revenue Hours	17,426		

Exhibit 99: Route 63 Map



### 10.2.2.3 Route 65

The proposal switches the Montclair and Chino portions of Route 65 and Route 68 in the interest of increasing efficiency in both overall. This change is in direct response to the recommendation in the Comprehensive Operational Analysis (COA) of Omnitrans. It aligns frequency better with ridership demand by transferring frequency and resources from Ramona Avenue to Central Avenue between Chino Transit Center and Montclair Transit Center. The Arrow Hwy section of the current Route 68 is moved onto the now higher frequency Route 65 to maintain the level of service on Arrow.

Additionally, the route is moved to serve Archibald from Haven Avenue between Arrow Route and Baseline. This extends the North-South service in the City of Rancho Cucamonga because Haven Avenue has service provided by Route 81.

Exhibit 101: Route 65 Map

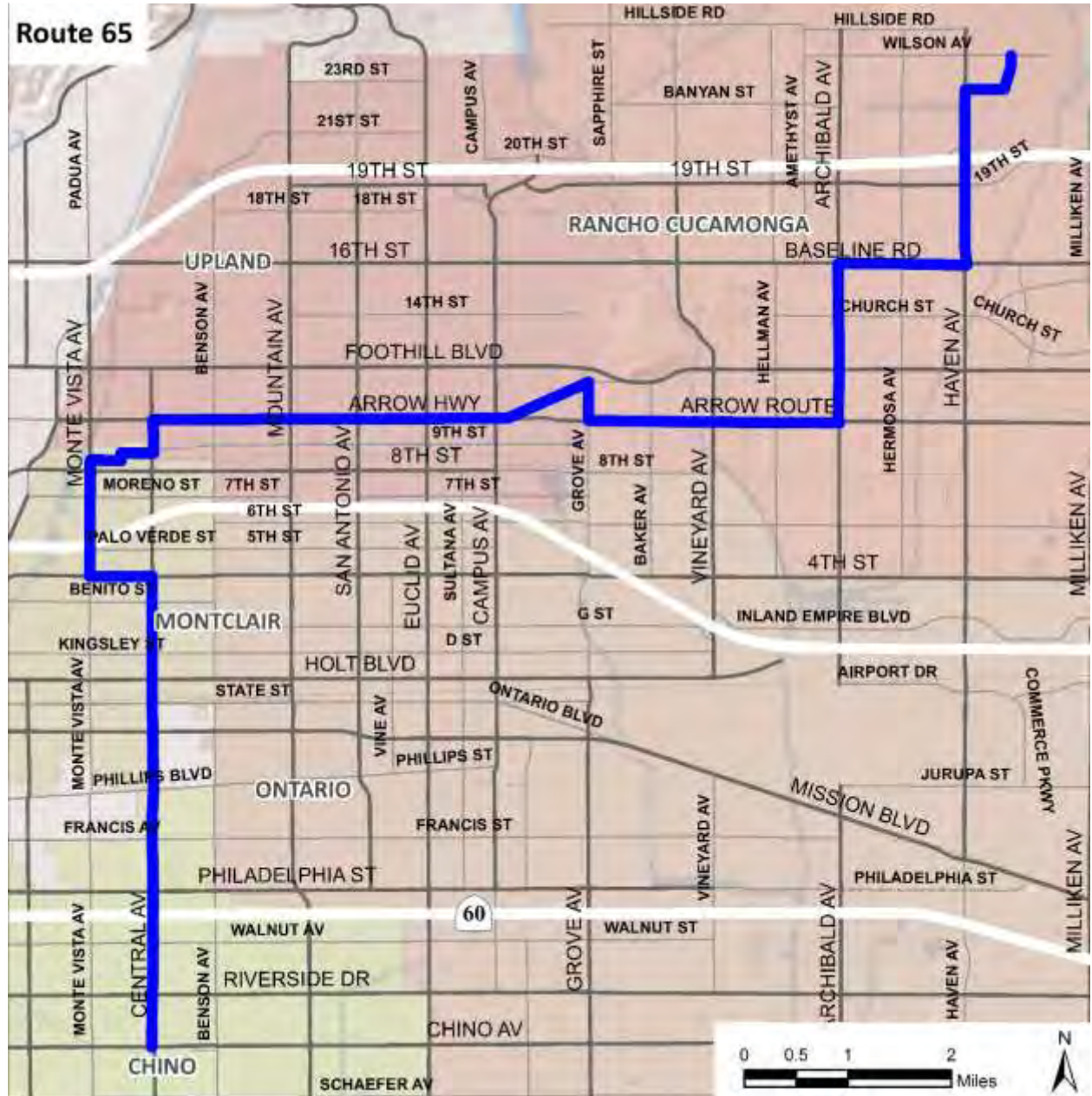


Exhibit 100: Route 65 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	6	3	3
Frequency	30	60	60
Span	4:36-23:01	6:05-19:30	6:40-19:30
Rev. Hours			
Daily	100.50	36.25	34.50
Annual	25,628	1,885	1,794
Annual Total Revenue Hours	29,307		

## 10.2.2.4 Route 66

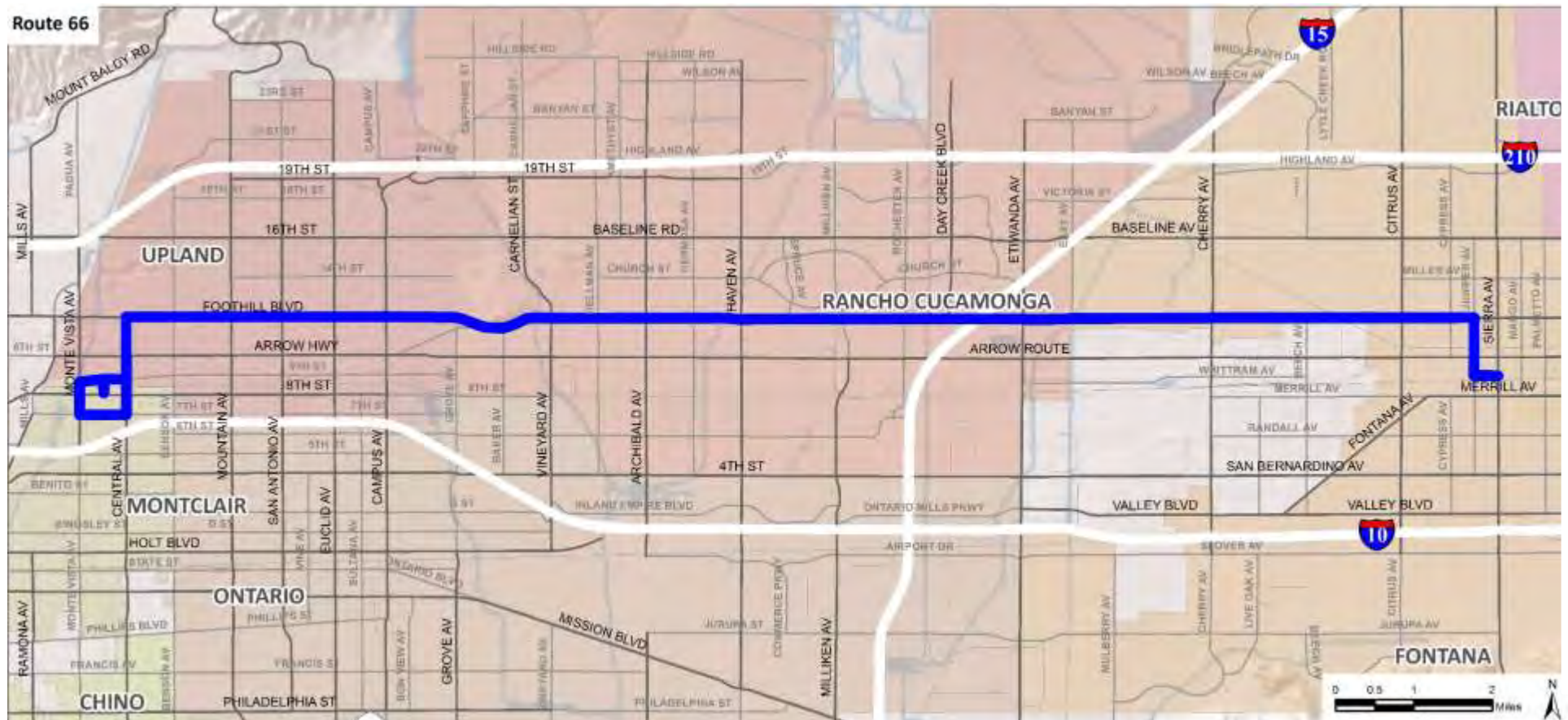
Route 66 is key east-west high-frequency route that serves the western portion of the Foothill BRT Corridor that was studied by SANBAG.

The route is among Omnitrans highest-ridership routes and the route provides direct east-west travel between Fontana, Rancho Cucamonga, Upland and Montclair. There are no proposed changes for Route 66 within the OmniConnects plan.

Exhibit 103: Route 66 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	10	6	6
Frequency	15	30	30
Span	4:19-23:12	5:46-22:15	5:51-19:29
Rev. Hours			
Daily	154.35	79.70	60.50
Annual	39,359	4,144	3,146
Annual Total Revenue Hours			46,649

Exhibit 102: Route 66 Map



### 10.2.2.5 Route 67

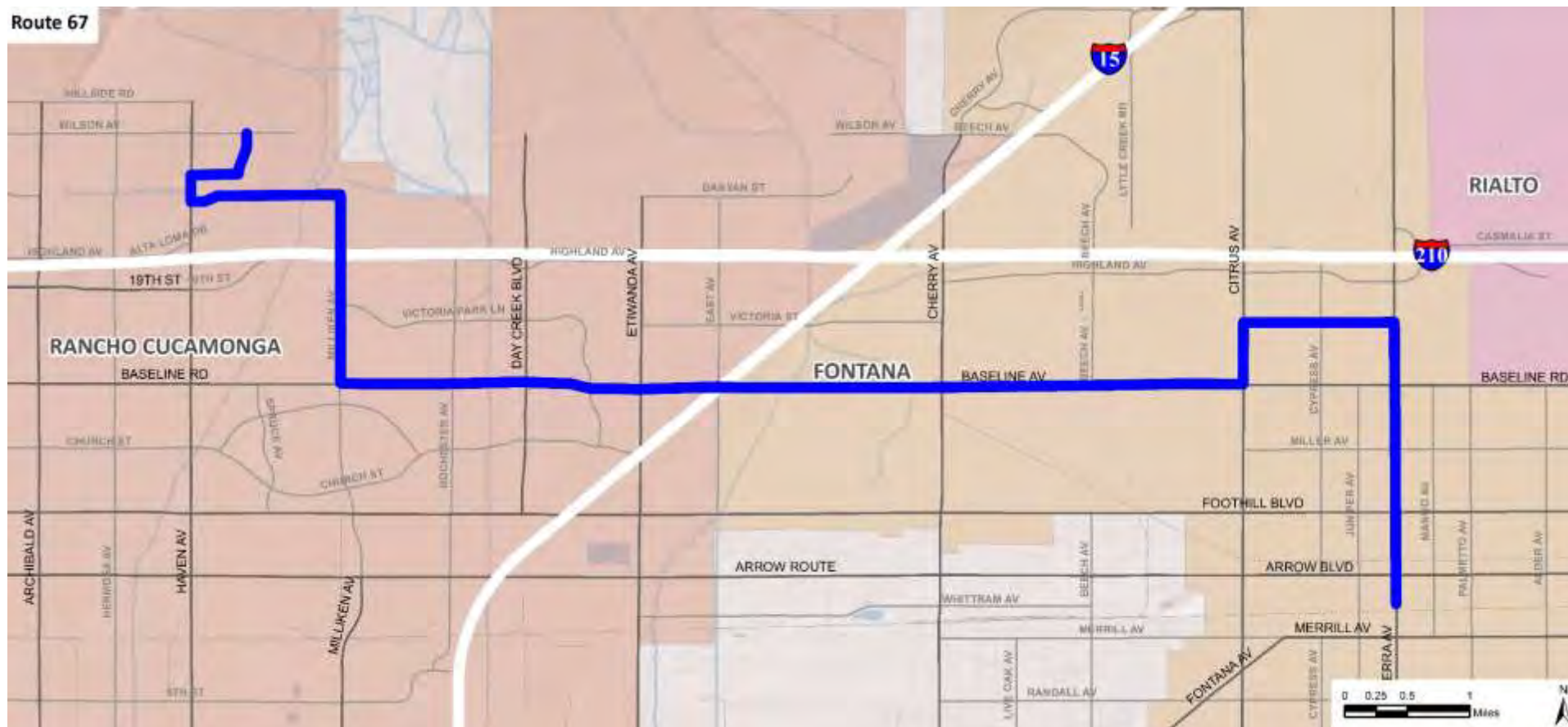
Route 67 is currently the second worst performing regular fixed route in terms of passengers per hour and farebox recovery rate. Omnitrans proposes shortening the route to serve as a direct connection between the City of Fontana and Chaffey College. This also offers a one-seat ride between the Chaffey College Fontana Campus and the Chaffey College main campus. This should work to expand ridership and may address the overcrowding issues on Haven Avenue.

The proposal does eliminate Route 67's current travel on Baseline west of Milliken Avenue and on Mountain Avenue. The Mountain Avenue portion is picked up by the realignment of Route 63. The baseline portion has two key stops at Archibald and Carnelian which are picked up by the restructuring of the north-south routes in the area. This change should help focus longer-distance east-west travel on Route 66 on Foothill rather than reduce the travel options.

Exhibit 105: Route 67 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	2	NA	NA
Frequency	60	NA	NA
Span	5:37-20:22	NA	NA
Rev. Hours			
Daily	32.17	NA	NA
Annual	8,203	NA	NA
Annual Total Revenue Hours	8,203		

Exhibit 104: Route 67 Map



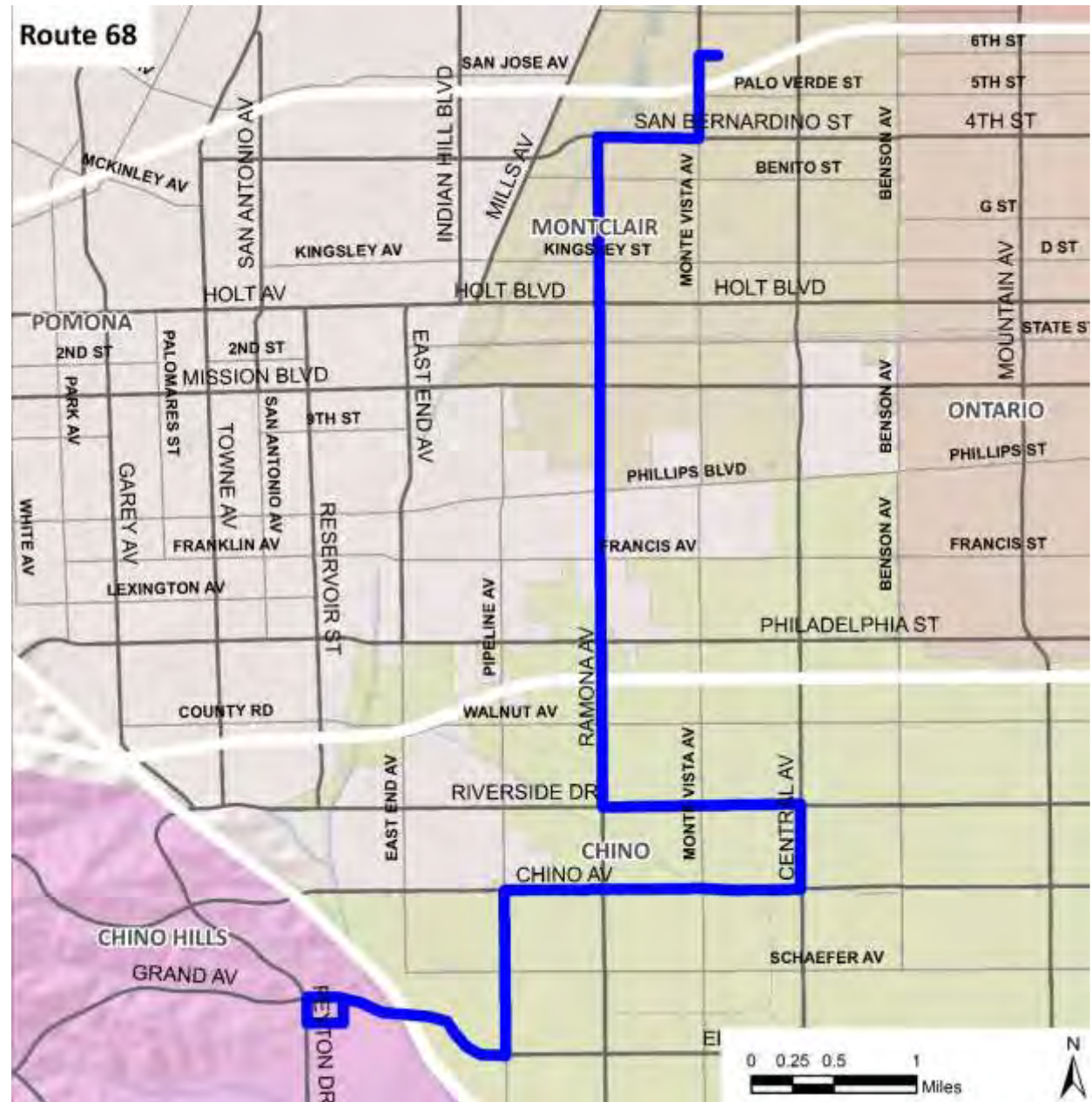
## 10.2.2.6 Route 68

The Route 68 proposal is a counterbalancing change to Route 65. Route 65 combined the higher performing sections of the two routes and provided them with higher 30 minute frequency. Route 68, took the lower performing sections of the two routes, primarily on Ramona Avenue, Chino Avenue and Grand Avenue, and delivers 60 minute service frequency. This change helps match resource deployment and ridership demand between the two routes in the area, without abandoning any sections of the routes in Chino Hills, Chino or Montclair.

Exhibit 107: Route 68 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	2	2	2
Frequency	60	60	60
Span	4:36-22:34	6:40-19:30	6:40-19:30
Rev. Hours			
Daily	33.93	23.67	23.67
Annual	8,653	1,231	1,231
Annual Total Revenue Hours	11,115		

Exhibit 106: Route 68 Map



## 10.2.2.7 Route 80

The proposed changes to Route 80 are designed to reduce the redundancy of service on Holt Blvd., Mountain Avenue and between Holt Blvd. and the Montclair Transit Center. By focusing the route primarily as a north-south route primarily between downtown Ontario and Chaffey College, Omnitrans system remains largely unchanged. Eliminating the duplication allows for an increase in reliability on the route while also allowing the north-south travel to fall on a signal route either Route 80 on Vineyard, Route 63 on Mountain or Route 65 on Central.

Exhibit 108: Route 80 Map

Exhibit 109: Route 80 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	2	2	2
Frequency	60	60	60
Span	4:33-21:24	6:30-19:40	6:30-19:40
Rev. Hours			
Daily	39.57	28.63	28.63
Annual	10,090	1,489	1,489
Annual Total Revenue Hours	13,068		



## 10.2.2.8 Route 81

The proposed revision to Route 81 incorporates a combination of some of the elements of old Route 81 and Route 82. What was a more circuitous coverage route, especially in its northern leg, along Milliken to Foothill, Day Creek, and Victoria Park to serve Victoria Gardens is proposed to be straightened and remain essentially on Haven, leaving it only to serve Ontario Mills.

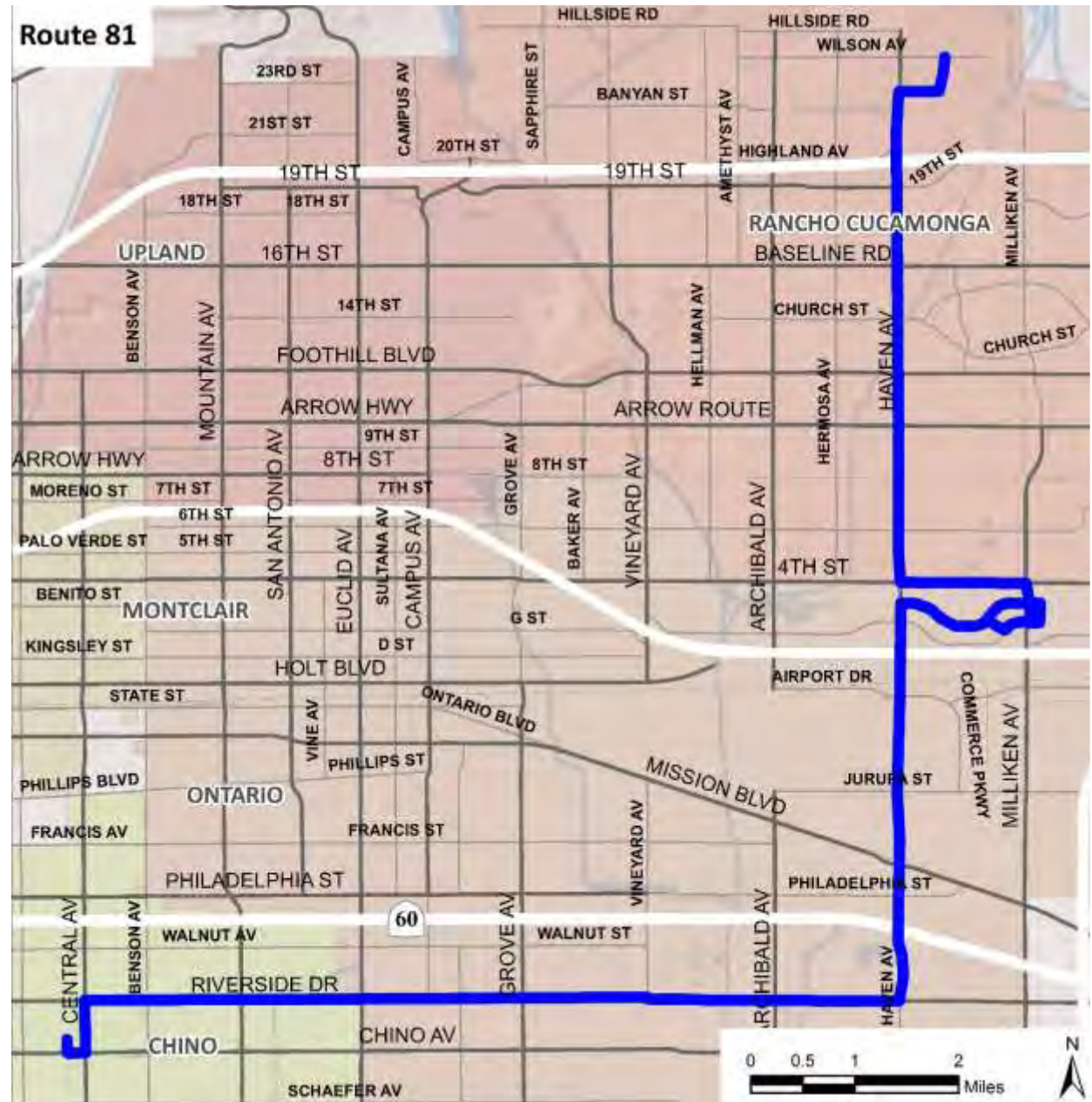
Route 82 will be left to cover this region (including Victoria Gardens), and by moving 81 to Haven, it frees 82 to concentrate on Milliken. Between these two routes, riders from that short stretch of Commerce can walk to Haven and take 81, or walk to Milliken and take 82 (about half a mile either way). This alignment removes a great deal of the coverage aspect of both routes, and is much straighter both along Milliken and along Riverside.

Longer-term Omnitrans may wish to also consider a short-long combination of this route designed to increase frequency between Ontario Mills and Chaffey College to 30 minutes prior to seeking an improvement of frequency along the entire route.

Exhibit 111: Route 81 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	3	3	NA
Frequency	60	60	NA
Span	4:12-22:20	6:14-1910	NA
Rev. Hours			
Daily	40.55	31.90	NA
Annual	10,340	1,659	NA
Annual Total Revenue Hours			12,000

Exhibit 110: Route 81 Map



## 10.2.2.9 Route 82

Route 82 was originally designed to travel north-south on Milliken between Jurupa and Ontario Mills. This was abandoned due to traffic concerns. However, with the completion of the North Milliken Railroad Grade Separation Project near Milliken Ave and Airport Drive, Omnitrans can return to the originally planned routing.

This change will create a new connection between Ontario Mills Mall and Victoria Gardens and will include a stop at the Rancho Cucamonga Metrolink Station.

Exhibit 112: Route 82 Map

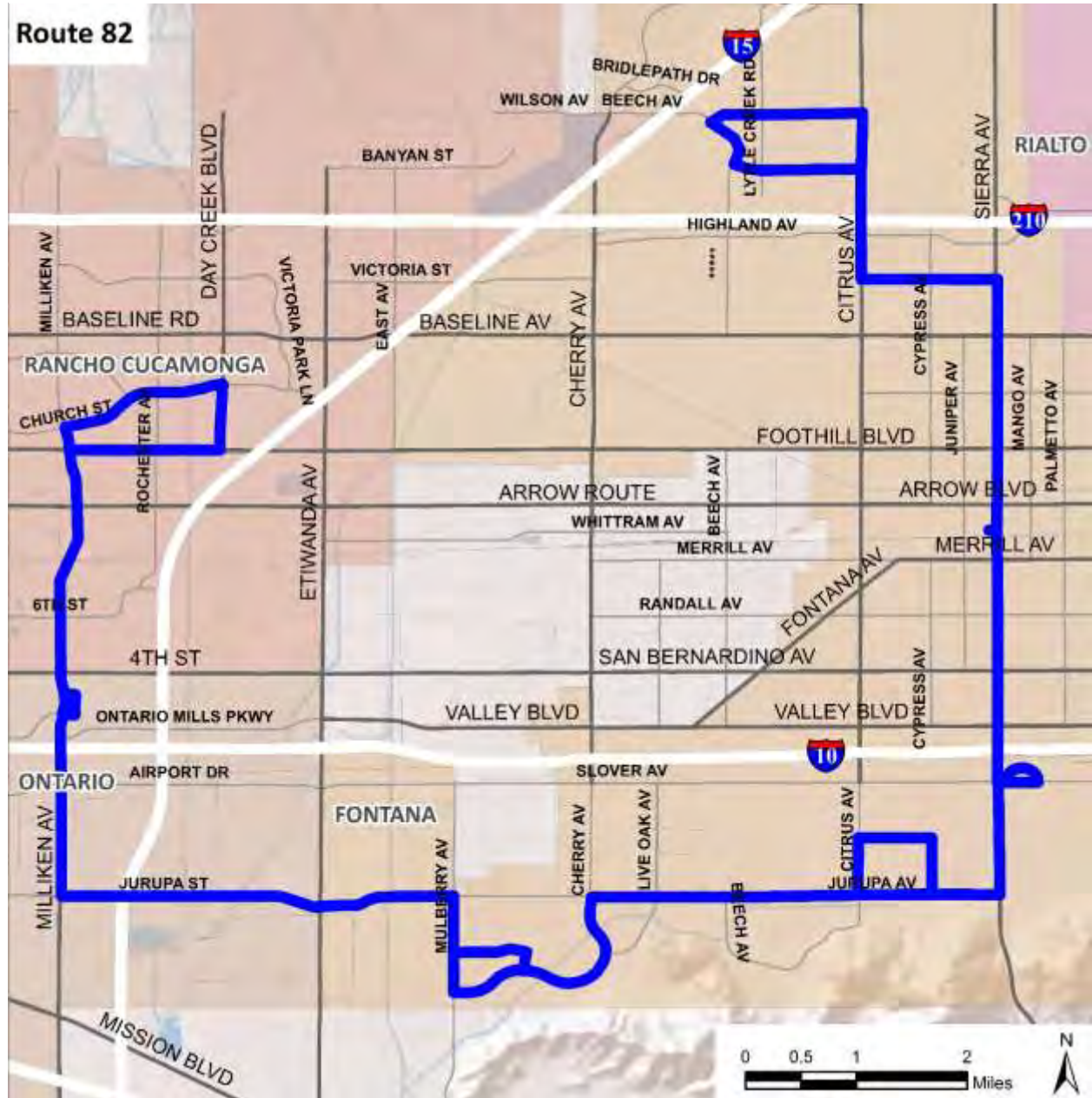


Exhibit 113: Route 82 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	5	2	2
Frequency	60	60	60
Span	4:35-22:00	6:14-19:10	6:14-19:10
Rev. Hours			
Daily	69.95	23.87	23.87
Annual	17,837	1,241	1,241
Annual Total Revenue Hours		20,319	



### 10.2.2.10 Route 83

This proposed alignment to Route 83 reduces the number of turns at the southern portion of the route, and makes it straighter and more efficient. It also takes advantage of more of the full length of College Park so that the alignment may better serve the ridership of the Chaffey College Chino campus there.

The College Park development in Chino was planned with bus service in mind. Bus turnouts and shelters were built in many areas even prior to some of the home construction. This proposed service change is designed to follow through on Omnitrans commitment to working with cities and developers as they build infrastructure for transit.

Exhibit 115: Route 83 Map

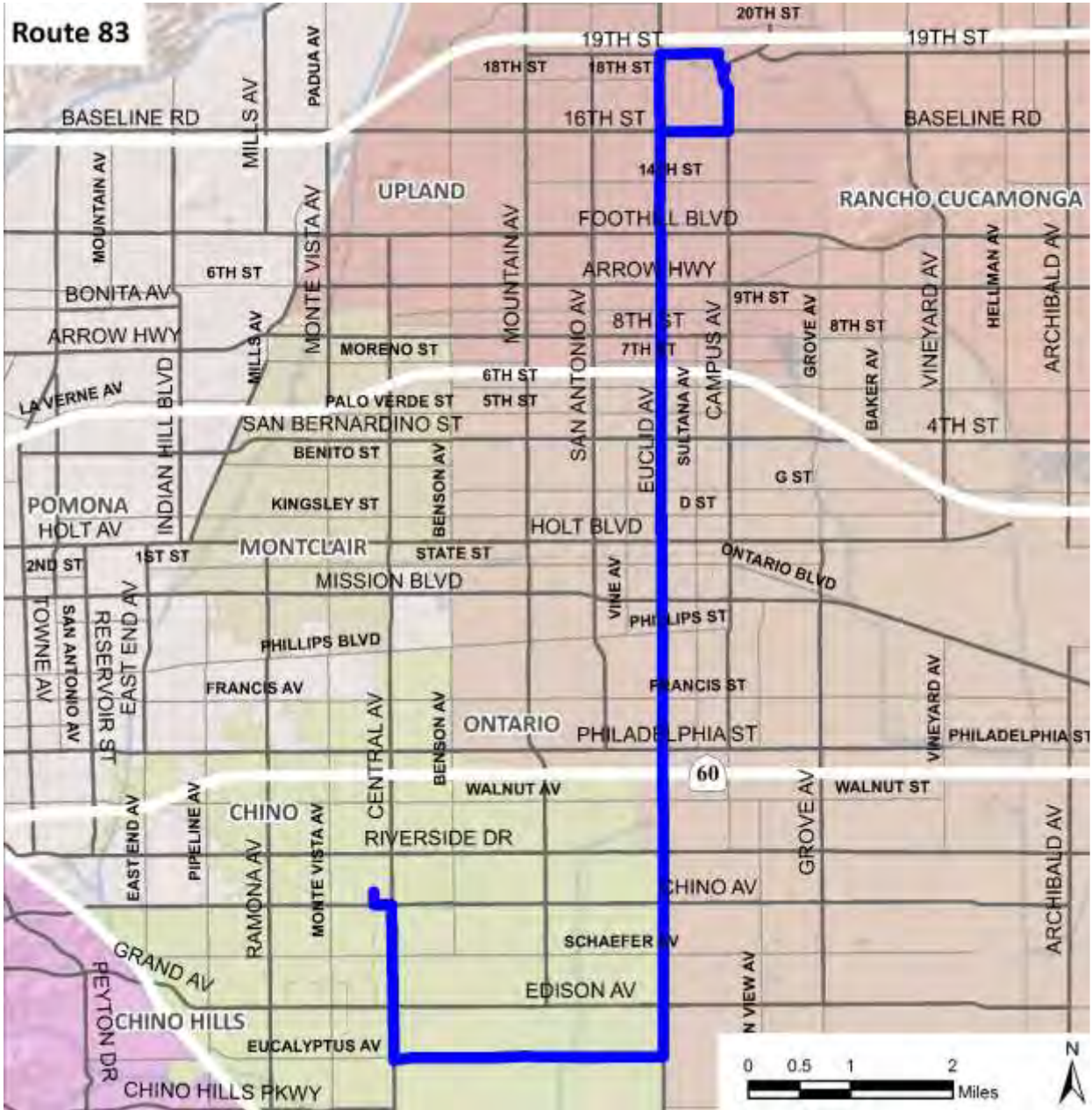


Exhibit 114: Route 83 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	2	2	2
Frequency	60	60	60
Span	5:49-21:44	5:51-20:36	5:51-19:37
Rev. Hours			
Daily	29.83	27.50	25.53
Annual	7,608	1,430	1,328
Annual Total Revenue Hours	10,366		

## 10.2.2.11 Route 84

Route 84 is proposed as a coverage-oriented route designed to pick up portions of Route 63 (North of Holt Blvd on Campus) and Route 81 (South of Holt Blvd. on Campus, Francis and Vineyard) that were left off of those routes due to the straightening of service.

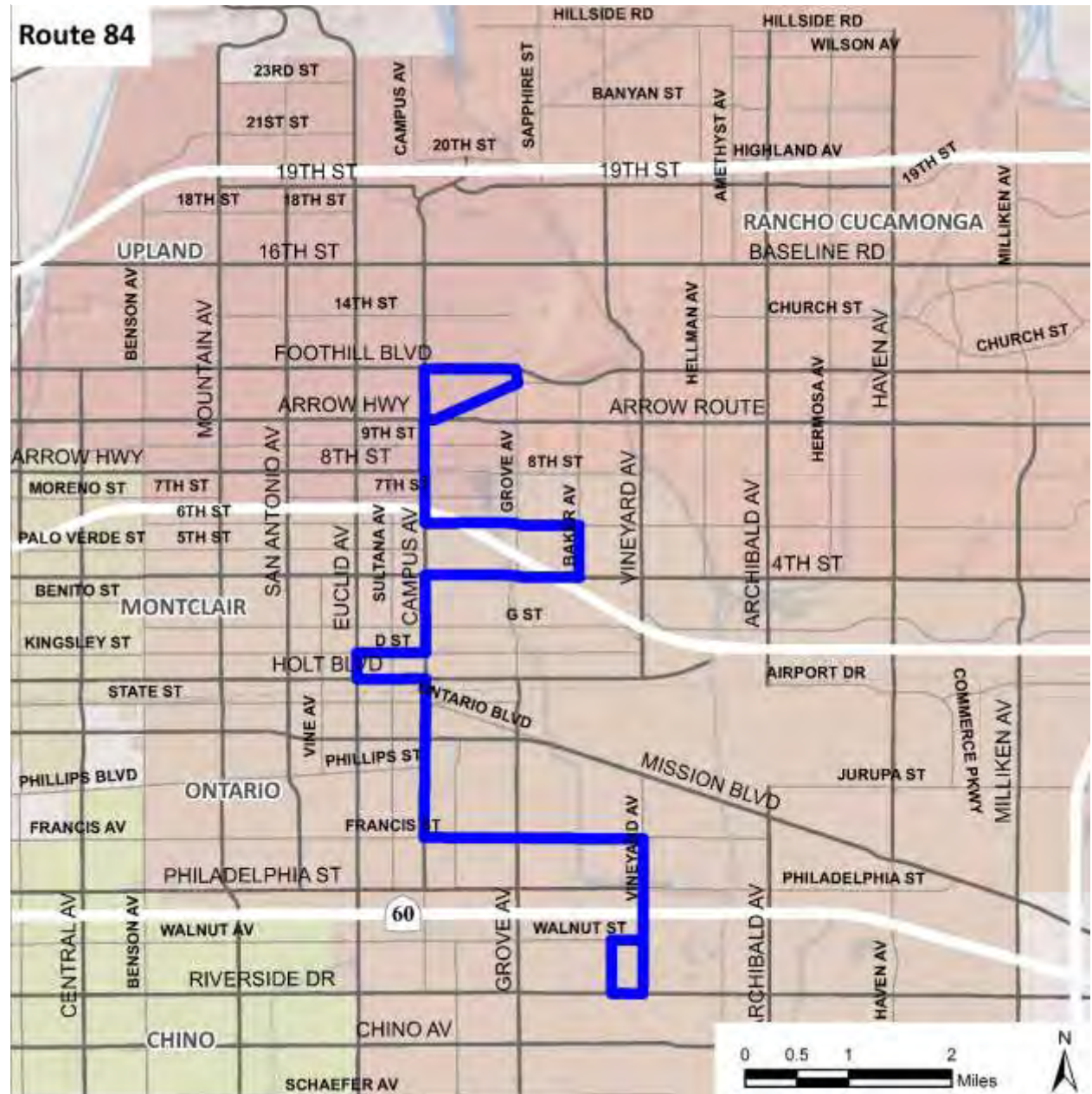
The route does connect with Route 61 in downtown Ontario. This will provide Route 61 riders with transfers to two important destinations: San Antonio Community Hospital and the Kaiser Permanente Ontario Medical Center. There is also ample residential ridership opportunities along the route to feed into the more business oriented Route 61.

The route does not offer as direct north-south travel as Omnitrans would prefer for travel speed, reliability and ease of understanding, but in this case the ridership patterns on Baker Avenue and at the Ontario Civic Center warranted the proposed deviations.

Exhibit 116: Route 84 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	2	NA	NA
Frequency	60	NA	NA
Span	4:12-22:20	NA	NA
Rev. Hours			
Daily	35.00	NA	NA
Annual	8,925	NA	NA
Annual Total Revenue Hours			8,925

Exhibit 117: Route 84 Map



### 10.2.2.12 OmniGo Chino Hills: Route 365

OmniGo Route 365 will remain essentially unchanged except for the addition of one more of three tripper services: in addition to the Peyton/Glen Ridge/Rolling Ridge tripper and the shorter Butterfield Ranch tripper, a third tripper is proposed along Highway 71 to Pine, then to Butterfield Ranch to serve the high school. No further changes are recommended to this route. The route is expected to see an increase in ridership and usage should the proposal to eliminate OmniLink service continue.

Exhibit 119: OmniGo Chino Hills Map (Route 365)

Exhibit 118: Route 365 Service Summary

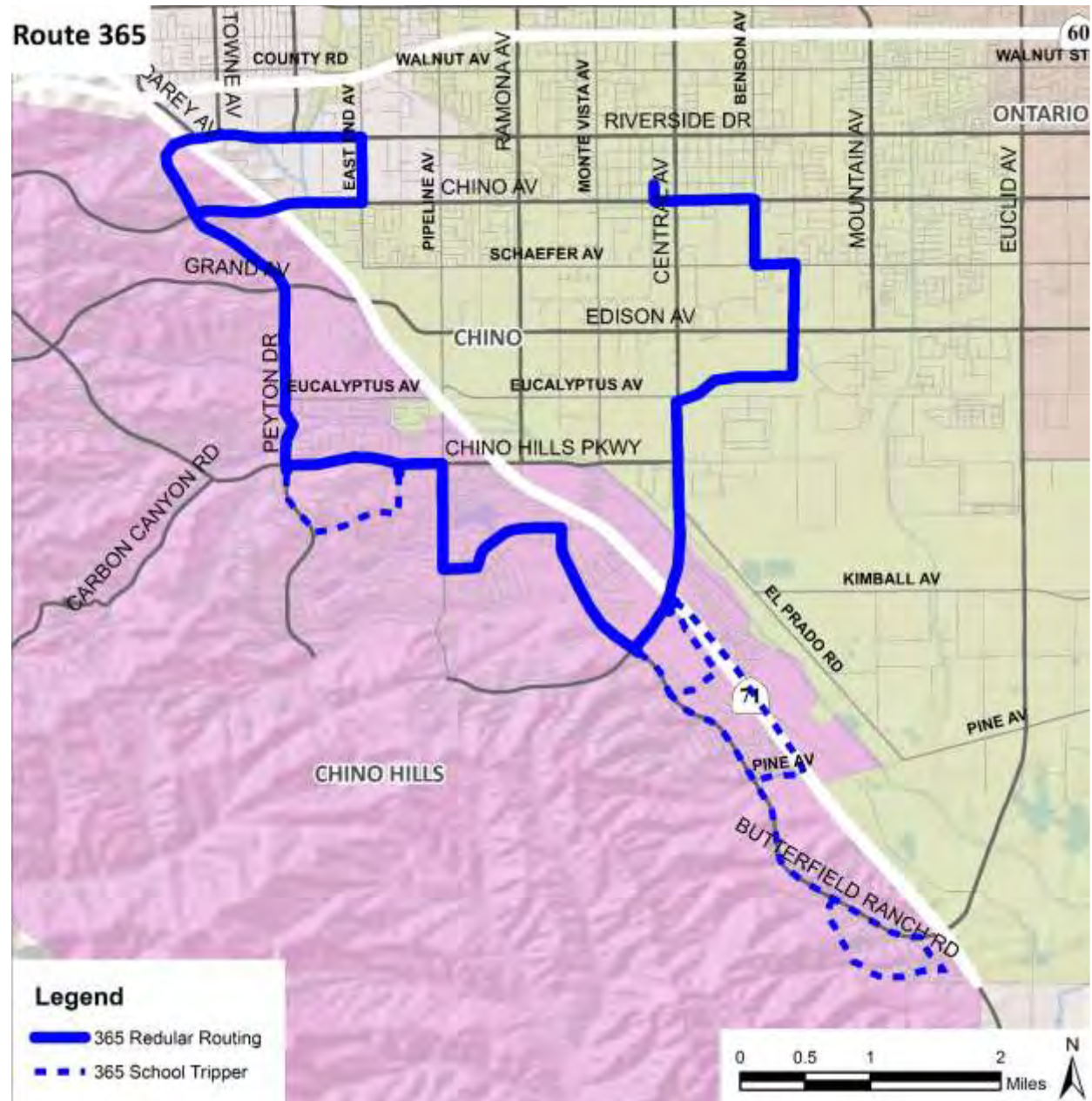
	Weekday	Saturday	Sunday
Peak Vehicles	2	2	2
Frequency	60	60	60
Span	4:59-22:09	6:04-18:59	6:05-17:59
Rev. Hours			
Daily	33.3	25.78	23.78
Annual	8,492	1,341	1,237
Annual Total Revenue Hours	11,070		

### 10.2.2.13 Other Areas for Consideration

The proposed restructuring of West-Valley routes addresses many of the reoccurring requests from riders and stakeholders. There are additional requests that Omnitrans received that warranted evaluation, but did not fit into the plan included:

- ▶ Connection to Eastvale and Corona, and;
- ▶ City of Industry Metrolink Station.

Omnitrans will continue to monitor developments in the area and work with partner agencies on longer-term service plans..



**10.2.3 Summary of Local Route Proposals**

Exhibit 120 provides a route and day type summary of the routing proposals outlined above in the unconstrained plan.

**Exhibit 120: Summary Statistics of Proposed Local and OmniGo Route Changes**

Route	Day	Frequency		Peak Vehicles			Annual Revenue Hours			Annual Fully Allocated Cost (2013 \$s)		
		Today	Proposed	Today	Proposed	Δ	Today	Proposed	Δ	Today	Proposed	Δ
<b>Local Routes</b>												
1	Weekday	15/30	15/30	7	7	0	27,407	27,407	0	\$ 2,554,332	\$ 2,554,332	\$ -
	Saturday	30	15/30	4	4	0	2,654	2,654	0	\$ 247,353	\$ 247,353	\$ -
	Sunday	30	15/30	4	4	0	2,381	2,381	0	\$ 221,909	\$ 221,909	\$ -
2	Weekday	15/30	30	11	6	-5	36,049	25,883	-10,166	\$ 3,359,767	\$ 2,412,296	\$ (947,471)
	Saturday	20	15	8	8	0	5,198	5,782	584	\$ 484,454	\$ 538,882	\$ 54,429
	Sunday	20/30	15	8	8	0	4,273	5,061	788	\$ 398,244	\$ 471,685	\$ 73,442
3	Weekday	15/20	15	6	7	1	21,331	26,444	5,113	\$ 1,988,049	\$ 2,464,581	\$ 476,532
	Saturday	20	20	5	5	0	3,233	3,233	0	\$ 301,316	\$ 301,316	\$ -
	Sunday	20	20	5	5	0	2,970	2,970	0	\$ 276,804	\$ 276,804	\$ -
4	Weekday	15/20	15	6	7	1	20,413	26,444	6,031	\$ 1,902,492	\$ 2,464,581	\$ 562,089
	Saturday	20	20	5	5	0	3,428	3,428	0	\$ 319,490	\$ 319,490	\$ -
	Sunday	20	20	5	5	0	2,974	2,974	0	\$ 277,177	\$ 277,177	\$ -
5	Weekday	30/35	30	4	5	1	16,685	20,825	4,140	\$ 1,555,042	\$ 1,940,890	\$ 385,848
	Saturday	60	60	2	2	0	1,436	1,436	0	\$ 133,835	\$ 133,835	\$ -
	Sunday	60	60	2	2	0	1,245	1,245	0	\$ 116,034	\$ 116,034	\$ -
7	Weekday	30/60	30/60	4	3	-1	10,774	8,657	-2,117	\$ 1,004,137	\$ 806,832	\$ (197,304)
	Saturday	60	60	2	2	0	1,096	1,002	-94	\$ 102,147	\$ 93,406	\$ (8,741)
	Sunday	60	60	2	2	0	1,005	919	-86	\$ 93,666	\$ 85,651	\$ (8,015)
8	Weekday	60	60/30	3	5	2	12,725	18,934	6,209	\$ 1,185,970	\$ 1,764,649	\$ 578,679
	Saturday	60	60	3	3	0	1,772	1,772	0	\$ 165,150	\$ 165,150	\$ -
	Sunday	120	60	3	2	-1	797	800	3	\$ 74,280	\$ 74,560	\$ 280
9	Weekday	60	NA	4	0	-4	12,431	0	-12,431	\$ 1,158,569	\$ -	\$ (1,158,569)
	Saturday	60	NA	3	0	-3	2,363	0	-2,363	\$ 220,232	\$ -	\$ (220,232)
	Sunday	120	NA	Inter. 8	0	0	848	0	-848	\$ 79,034	\$ -	\$ (79,034)
10	Weekday	30/60	30/60	4	4	0	11,450	11,450	0	\$ 1,067,140	\$ 1,067,140	\$ -
	Saturday	60	60	2	2	0	1,345	1,345	0	\$ 125,354	\$ 125,354	\$ -
	Sunday	60	60	2	2	0	1,126	1,126	0	\$ 104,943	\$ 104,943	\$ -
11	Weekday	60	60	3	3	0	9,206	9,206	0	\$ 857,999	\$ 857,999	\$ -
	Saturday	60	60	2	2	0	1,132	1,132	0	\$ 105,502	\$ 105,502	\$ -
	Sunday	60	60	2	2	0	1,186	1,186	0	\$ 110,535	\$ 110,535	\$ -
14	Weekday	15	15	8	8	0	26,362	26,362	0	\$ 2,456,938	\$ 2,456,938	\$ -

Route	Day	Frequency		Peak Vehicles			Annual Revenue Hours			Annual Fully Allocated Cost (2013 \$s)		
		Today	Proposed	Today	Proposed	Δ	Today	Proposed	Δ	Today	Proposed	Δ
	Saturday	15/30	15	7	7	0	4,366	4,366	0	\$ 406,911	\$ 406,911	\$ -
	Sunday	15	15	7	7	0	3,993	3,993	0	\$ 372,148	\$ 372,148	\$ -
15	Weekday	30	30	8	8	0	30,065	30,065	0	\$ 2,802,058	\$ 2,802,058	\$ -
	Saturday	60	60	4	4	0	2,391	2,391	0	\$ 222,841	\$ 222,841	\$ -
	Sunday	60	60	4	4	0	2,310	2,310	0	\$ 215,292	\$ 215,292	\$ -
19	Weekday	30	30	7	9	2	26,135	35,445	9,310	\$ 2,435,782	\$ 3,303,474	\$ 867,692
	Saturday	60	60	4	9	5	2,515	2,916	401	\$ 234,398	\$ 271,771	\$ 37,373
	Sunday	60	60	4	5	1	2,362	2,686	324	\$ 220,138	\$ 250,335	\$ 30,197
20	Weekday	30	60	2	1	-1	7,599	4,293	-3,306	\$ 708,227	\$ 400,108	\$ (308,119)
	Saturday	60	60	1	1	0	624	624	0	\$ 40,560	\$ 40,560	\$ -
	Sunday	60	60	1	1	0	572	572	0	\$ 37,180	\$ 37,180	\$ -
22	Weekday	30	30	4	4	0	16,027	16,027	0	\$ 1,493,716	\$ 1,493,716	\$ -
	Saturday	60	60	2	2	0	1,143	1,143	0	\$ 106,528	\$ 106,528	\$ -
	Sunday	60	60	2	2	0	1,278	1,278	0	\$ 119,110	\$ 119,110	\$ -
29	Weekday	60	60	1	1	0	3,017	3,017	0	\$ 281,184	\$ 281,184	\$ -
	Saturday	60	60	1	1	0	564	564	0	\$ 36,660	\$ 36,660	\$ -
	Sunday	NA	NA	0	0	0	0	0	0	\$ -	\$ -	\$ -
61	Weekday	15	15	14	13	-1	50,378	48,052	-2,326	\$ 4,695,230	\$ 4,478,484	\$ (216,746)
	Saturday	15	15	13	13	0	8,413	8,413	0	\$ 784,092	\$ 784,092	\$ -
	Sunday	15	15	13	13	0	7,780	7,780	0	\$ 725,096	\$ 725,096	\$ -
63	Weekday	60	60	2	2	0	7,515	6,554	-962	\$ 700,398	\$ 610,786	\$ (89,612)
	Saturday	60	60	2	2	0	1,229	1,037	-193	\$ 114,543	\$ 96,602	\$ (17,941)
	Sunday	60	60	2	2	0	1,269	1,123	-146	\$ 118,271	\$ 104,664	\$ (13,607)
65	Weekday	60	30	2	6	4	9,096	25,628	16,532	\$ 847,747	\$ 2,388,530	\$ 1,540,782
	Saturday	60	60	2	3	1	1,195	1,885	690	\$ 111,374	\$ 175,682	\$ 64,308
	Sunday	60	60	2	3	1	1,195	1,794	599	\$ 111,374	\$ 167,201	\$ 55,827
66	Weekday	15/30	15/30	11	11	0	39,359	39,359	0	\$ 3,668,259	\$ 3,668,259	\$ -
	Saturday	30	30	6	6	0	4,144	4,144	0	\$ 386,221	\$ 386,221	\$ -
	Sunday	30	30	6	6	0	3,146	3,146	0	\$ 293,207	\$ 293,207	\$ -
67	Weekday	60	60	3	2	-1	10,526	5,203	-5,323	\$ 981,023	\$ 484,920	\$ (496,104)
	Saturday	NA	NA	0	0	0	0	0	0	\$ -	\$ -	\$ -
	Sunday	NA	NA	0	0	0	0	0	0	\$ -	\$ -	\$ -
68	Weekday	30	60	7	2	-5	27,145	8,653	-18,492	\$ 2,529,914	\$ 806,460	\$ (1,723,454)
	Saturday	60	60	3	2	-1	1,931	1,231	-700	\$ 179,969	\$ 114,729	\$ (65,240)
	Sunday	NA	NA	0	0	0	0	0	0	\$ -	\$ -	\$ -
80	Weekday	60	60	2	2	0	10,090	10,090	0	\$ 940,388	\$ 940,388	\$ -

Route	Day	Frequency		Peak Vehicles			Annual Revenue Hours			Annual Fully Allocated Cost (2013 \$s)		
		Today	Proposed	Today	Proposed	Δ	Today	Proposed	Δ	Today	Proposed	Δ
	Saturday	60	60	2	2	0	1,489	1,489	0	\$ 138,775	\$ 138,775	\$ -
	Sunday	60	60	2	2	0	1,489	1,489	0	\$ 138,775	\$ 138,775	\$ -
81	Weekday	60	60	3	3	0	12,615	12,852	237	\$ 1,175,718	\$ 1,197,806	\$ 22,088
	Saturday	NA	60	0	3	3	0	1,659	1,659	\$ -	\$ 154,619	\$ 154,619
	Sunday	NA	NA	0	0	0	0	0	0	\$ -	\$ -	\$ -
82	Weekday	60	60	4	4	0	16,409	16,409	0	\$ 1,529,319	\$ 1,529,319	\$ -
	Saturday	65	65	2	2	0	1,288	1,288	0	\$ 120,042	\$ 120,042	\$ -
	Sunday	65	65	2	2	0	1,288	1,288	0	\$ 120,042	\$ 120,042	\$ -
83	Weekday	60	60	2	2	0	7,992	7,608	-384	\$ 744,854	\$ 709,066	\$ (35,789)
	Saturday	60	60	2	2	0	1,474	1,430	-44	\$ 137,377	\$ 133,276	\$ (4,101)
	Sunday	60	60	2	2	0	1,420	1,328	-92	\$ 132,344	\$ 123,770	\$ (8,574)
84	Weekday	NA	60	0	2	2	0	8,925	8,925	\$ -	\$ 831,810	\$ 831,810
	Saturday	NA	NA	0	0	0	0	0	0	\$ -	\$ -	\$ -
	Sunday	NA	NA	0	0	0	0	0	0	\$ -	\$ -	\$ -
<b>Local Total</b>							582,131	583,605	1,474	\$ 54,204,977	\$ 54,342,318	\$ 137,341
<b>OmniGo Routes</b>												
Chino Hills	Weekday	60	60	2	2	0	8,492	8,492	0	\$ 791,454	\$ 791,454	\$ -
	Saturday	60	60	2	2	0	1,341	1,341	0	\$ 124,981	\$ 124,981	\$ -
	Sunday	60	60	2	2	0	1,237	1,237	0	\$ 115,288	\$ 115,288	\$ -
Grand Terrace	Weekday	70	70	1	1	0	3,884	3,884	0	\$ 361,989	\$ 361,989	\$ -
	Saturday	70	70	1	1	0	569	569	0	\$ 53,031	\$ 53,031	\$ -
	Sunday	70	70	1	1	0	509	509	0	\$ 47,439	\$ 47,439	\$ -
Yucaipa	Weekday	30/60	30/60	3	3	0	7,987	7,987	0	\$ 744,388	\$ 744,388	\$ -
	Saturday	30/NA	30/NA	2	2	0	1,396	1,396	0	\$ 130,107	\$ 130,107	\$ -
	Sunday	60/NA	60/NA	1	1	0	579	579	0	\$ 53,963	\$ 53,963	\$ -
<b>OmniGo Total</b>							25,994	25,994	0	\$ 2,422,641	\$ 2,422,641	\$ -

## 10.3 sbX Green Line

The sbX Green Line begins revenue service on April 28, 2014. The Green Line is Omnitrans' first sbX Bus Rapid Transit Corridor. It will operate on the E Street Corridor connecting the cities of San Bernardino and Loma Linda offering key connections at California State University San Bernardino, Downtown San Bernardino, Hospitality Lane, the Loma Linda University Medical Center and the Jerry Pettis VA Hospital. The sbX route and stations can be seen in Exhibit 121.

The OmniConnects plan does not propose changes to sbX at this time. Prior to proposing changes, Omnitrans needs to evaluate the route as it preforms. There are multiple areas of interest that staff will monitor include ridership, costs, fare revenue and the impact sbX has on Route 2 and neighboring routes. Once these trends have been established, Omnitrans will develop proposals to refine and improve sbX.

Within each of the Annual Service Elements, staff may present to Omnitrans' Board of Directors recommendations on potentially expanding sbX hours of operation in the evening or in the morning and also adding weekend service. These changes could be implemented though changes to the existing combination of Route 2 and sbX service, but it is too early to make a recommendation prior to the launch of revenue service.

Exhibit 121: Map of sbX Green Line



## 10.4 Future sbX BRT Corridors

Exhibit 122 shows the sbX bus rapid transit corridors outlined in Omnitrans' 2010 *System-Wide Transit Corridor Plan for the San Bernardino Valley* and SANBAG's 2010 *Long Range Transit Plan*. These corridors were identified as having potential for premium transit service, with possible features such as limited stops, enhanced bus stops (stations), and mechanisms for bypassing traffic congestion such as queue jumpers, transit signal priority, and/or dedicated bus lanes. Such service has the potential to

greatly increase transit ridership in the Valley by reducing travel times to be more competitive with the automobile and providing connections with rail service and other regional transit systems.

### 10.4.1 The West Valley Connector

The Holt Boulevard/4th Street (Route 61) corridor, shown in purple, is based on Omnitrans' existing local Route 61. The Route 61 currently has the highest ridership in the Omnitrans network (at around 6,100 boardings per average weekday). The cities of Pomona, Ontario, and Fontana each

completed studies in 2012/2013 related to the Holt Avenue/4th Street (Route 61) corridor within their communities. Building off of that momentum, Omnitrans applied for and received a grant from the Federal Transit Administration (FTA) to conduct an Alternatives Analysis for the corridor.

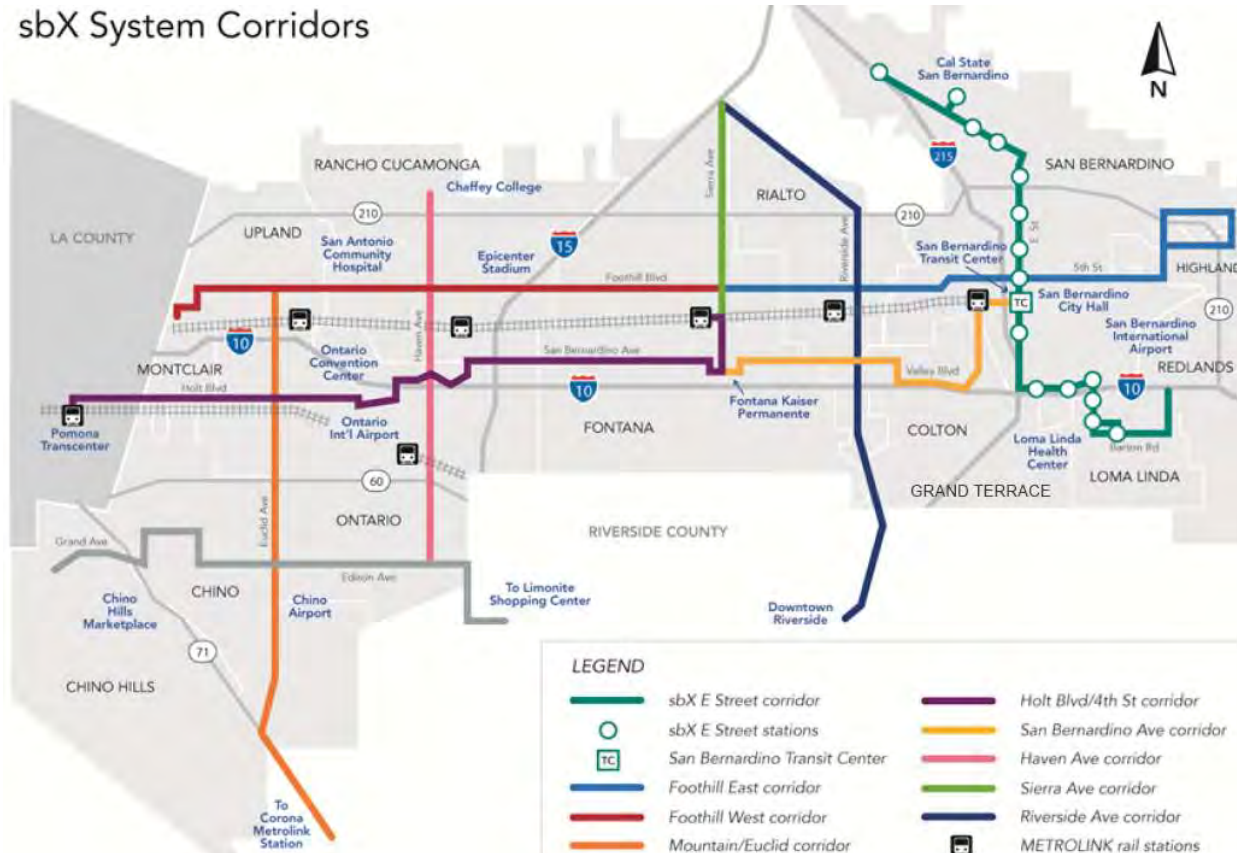
Parsons Transportation Group began work on the Alternatives Analysis for the Route 61 (Holt Blvd/San Bernardino Ave) corridor in January 2013. The study supplemented the work completed by the cities of Ontario, Fontana, and Pomona related to the corridor, particularly the City of Ontario's Holt Boulevard Mobility & Streetscape Strategic Plan, which identified street cross-sections and center-running dedicated lanes on portions of Holt Boulevard.

The Project Development Team (PDT) led by Omnitrans includes representatives of the major stakeholders along the corridor, including the cities of Fontana, Ontario, Rancho Cucamonga, Montclair, and Pomona, the County of San Bernardino, San Bernardino Associated Governments (SANBAG), Southern California Association of Governments (SCAG), LA Metro, Foothill Transit, Metrolink, the Ontario Airport (Los Angeles World Airports), Ontario Mills Mall, and others.

The PDT members and the Parsons team evaluated several initial alternatives and came to a consensus on the corridor alignment, which is shown below. The West Valley Connector Corridor, as it is now called, combines the Holt/San Bernardino/4th St. Corridor and the Foothill Corridor that were originally shown in the

Exhibit 122: Omnitrans Proposed sbX BRT Corridors

### sbX System Corridors



Produced by Parsons Transportation Group / MIG for Omnitrans Route 61 Alternatives Analysis, 2013



Exhibit 123: West Valley Connector Corridor Proposed Alignment and Station Locations



Produced by Parsons Transportation Group / MIG for Omnitrans Route 61 Alternatives Analysis, 2013

System-Wide Transit Corridor Plan for the San Bernardino Valley and in the Long Range Transit Plan. Based upon requests from the public, the cities of Ontario and Rancho Cucamonga, and SANBAG, this altered route provides more direct connections between the Ontario Airport, Ontario Mills Mall, the Rancho Cucamonga Metrolink Station (Metrolink San Bernardino Line), Victoria

Gardens, the Fontana Transit Center, and Kaiser Medical Center Fontana.

Several alternatives were evaluated with different levels of capital expenditures. A full bus rapid transit (BRT) line similar to the E Street Corridor / sbX Green Line was found to have the most travel time benefits and highest ridership but also the highest cost. A Rapid/BRT Lite alternative (without

dedicated bus lanes), could also provide significant benefits of ridership and travel time savings, and would cost from \$20 million to \$50 million depending upon the level of amenities provided and the type of vehicles used.

Given the high level of benefits and ridership that could be provided by a Rapid or BRT project on the West Valley Connector Corridor, Omnitrans staff

recommends moving forward with the West Valley Connector Corridor project as the first priority project on the unconstrained service plan and unconstrained capital plan. Because there is not anticipated to be additional operating funding available to operate the West Valley Connector Corridor route, it is recommended to shift operating resources from existing routes in the vicinity of the Corridor, primarily by reducing frequency on local Routes 61 and 66 where they overlap the Corridor.

Once the operating and capital budget are in place, the project would move from the unconstrained list to the constrained list. To move forward with the West Valley Connector Corridor, the next steps involve public outreach, environmental screening, engineering design, and construction.

Out of the ten future corridors, Omnitrans staff recommends going forward with the West Valley Connector Corridor (Rapid/BRT-Lite option) first, due to several factors. The Route 61 is currently the highest ridership corridor in the Omnitrans system, and the West Valley Connector Corridor (Rapid/BRT-Lite option) will increase ridership by 30% in the near-term along the corridor (currently Route 61 and portion of Route 66).

As discussed in the Our Community section, the City of Ontario has the highest and fastest-increasing employment in the San Bernardino Valley. Its population and employment will have doubled from 2010 to 2035, resulting in traffic congestion that cannot be easily solved by increasing vehicular capacity alone. For this reason, the City of Ontario identified a long-term

goal of widening and reconstructing Holt Boulevard through the City of Ontario with center-running dedicated transit lanes on a portion of the corridor; thereby giving a competitive advantage transit by allowing it to bypass traffic congestion.

The West Valley Connector has the capability of moving to the Constrained Plan, given that enough changes are made to the underlying local Routes 66 and 61. In order to determine what the best approach is to having the local and West Valley Connector in place, Omnitrans staff also recommends that the West Valley Connector remain in the unconstrained plan for the time being in order to gather lessons learned from the introduction of the sbX Green Line.

The unconstrained service plan for the West Valley Connector is based off of the completion of Phase 1 of the plan which is a limited-stop rapid with 10-minute peak and 15 minute-off peak service.

Currently, Route 66 and 61 have a combined expense of \$8.3 million on weekday service. The estimated cost of the West Valley Connector is \$5.1 million, which can be covered by the current expense on Routes 66 and 61. Determining what share of the \$8.3 million that can be transferred to the West Valley Connector when it is proposed for operation will be determined based on the lessons learned from the launch of sbX Green line service.

## 10.4.2 Foothill Central Corridor Rapid / Limited-Stop Express Route

Omnitrans staff recommends the Foothill Central Corridor as the second project on the unconstrained service and capital plans because it provides a connection between the West Valley Connector Corridor and the sbX Green Line.

In SANBAG’s 2010 *Long Range Transit Plan*, the Foothill East corridor from Fontana to Highland was identified as the corridor with the highest potential future ridership in the Omnitrans system (see Exhibit 122). In SANBAG’s *Integrated Transit and Land Use Planning for the Foothill Boulevard/5<sup>th</sup> Street/Baseline Road Transit Corridor* study completed in 2013, the central

section of the Foothill Corridor, from Fontana to San Bernardino, was identified as the section with the most near-term ridership potential based on the ridership productivity (passengers per hour) or Omnitrans’ existing local Route 14. The Foothill Central Corridor is shown in red in Exhibit 124 below.

Exhibit 124: Map of Foothill West and Foothill East Corridors



Produced by TMD for SANBAG’s *Integrated Transit and Land Use Planning for the Foothill Boulevard/5th Street/Baseline Road Transit Corridor* study, 2013

**Exhibit 126: Limited-Stop Overlay Service with Local Service**

Service	Frequency	# of Stops	Stop Spacing
Limited Overlay	15 min	37	1 mile
Local	30 min	118	¼ mile

Corridor Segment	Net Yearly Operating Cost	Yearly Operating Cost per Route Mile
West	(\$2.7M)	(\$421,000)
Central	(\$1.7M)	(\$575,000)
East	(\$731,000)	(\$542,000)

Produced by TMD for SANBAG's *Integrated Transit and Land Use Planning for the Foothill Boulevard/5th Street/Baseline Road Transit Corridor study, 2013*

SANBAG's *Integrated Transit and Land Use Planning for the Foothill Boulevard/5th Street/Baseline Road Transit Corridor study, 2013,*

the Foothill Corridor would have the greatest long-term benefits and highest projected ridership compared with Rapid/BRT-Lite or limited stop express route options. The study recommended moving forward with a phased approach to implementing the corridor, starting with a limited-stop express route and transit signal priority equipment as funds become available, then building up to full BRT in the future.

The initial phase recommended in SANBAG's *Integrated Transit and Land Use Planning for the Foothill Boulevard/5th Street/Baseline Road Transit Corridor study* is a limited-stop express service overlaid on top of existing local service. The operating scenarios and estimated operating costs are outlined Exhibit 126

**10.4.3 Future BRT Corridors Summary**

While Omnitrans strives to realize the 10-corridor sbX BRT system that was originally planned, this plan is a many year plan that may be realized over the course of the next several short-range transit plans. Within OmniConnects, Omnitrans proposes working towards delivering service improvements to the next two proposed corridors. While there is limited capital and operating funding available, Omnitrans will seek to maximize the opportunities as they are presented. The estimated annual operating costs and key service characteristics for the next two BRT corridors are described in

**Exhibit 125: Summary Service Characteristics for Two Future BRT Corridors**

Route	Day	Frequency		Peak Vehicles			Annual Revenue Hours			Annual Fully Allocated Cost (2013 \$)		
		Today	Proposed	Today	Proposed	Δ	Today	Proposed	Δ	Today	Proposed	Δ
<b>Future BRT Corridors</b>												
West Valley Connector	Weekday	n/a	10/15	0	17	17	0	41,000	41,000	\$ -	\$ 5,500,000	\$ 5,500,000
	Saturday	n/a	n/a	0	0	0	0	0	0	\$ -	\$ -	\$ -
	Sunday	n/a	n/a	0	0	0	0	0	0	\$ -	\$ -	\$ -
Foothill Central Corridor	Weekday	n/a	15	0	6	6	0	18,630	18,630	\$ -	\$ 1,700,000	\$ 1,700,000
	Saturday	n/a	n/a	0	0	0	0	0	0	\$ -	\$ -	\$ -
	Sunday	n/a	n/a	0	0	0	0	0	0	\$ -	\$ -	\$ -
<b>Future BRT Corridor Total</b>							0	59,630	59,630	\$ -	\$ 7,200,000	\$ 7,200,000

found that a full bus rapid transit (BRT) line along

## 10.5 Freeway Express

The primary impediment to increased use of transit is travel time. Omnitrans' Route 215, which connects Downtown San Bernardino and Downtown Riverside, with one intermediary stop in Colton has been one of Omnitrans' fastest growing routes in terms of ridership averaging gains of 16% per year over the last five years. One of the primary reasons for this is the route now travels and two-to-three times the speed of regular bus service.

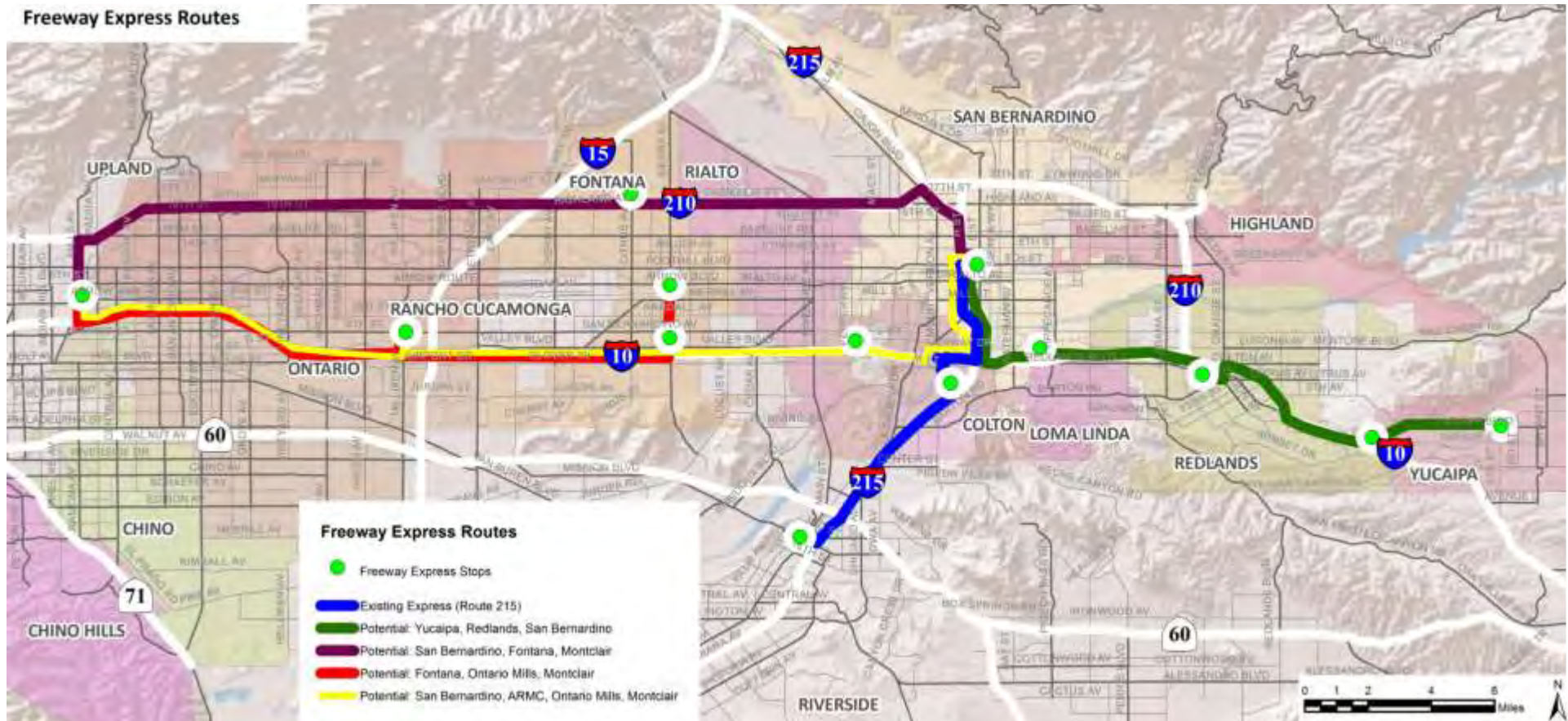
Omnitrans partner agencies including Riverside Transit Agency with the CommuterLink, Foothill Transit with Silver Streak and Victor Valley Transit Authority with BV Link have also seen strong growth and the successful deployment of freeway routes.

Omnitrans' customers routinely ask that the old Route 90 be returned, which was a freeway express route between San Bernardino and Montclair similar to the yellow route below.

Exhibit 127 shows a potential addition of four freeway express routes in addition to the existing Route 215. Within the OmniConnects planning horizon, Omnitrans plans to seek funding opportunities for these routes. They become an important east-west connection that may supplement the future BRT corridors, or be the east-west connection should the east-west BRT be delayed.

Omnitrans does not propose a priority to the routing only that they be evaluated as part of

Exhibit 127: Potential Freeway Express System



Omnitrans future as funding becomes available.

Exhibit 128: Route 215 Map

Each of the proposed freeway express routes would be primarily evaluated as a peak time of day service offering two to three bi-directional trips in the morning and late afternoon/evening.

### 10.5.1 Route 215

Route 215 is Omnitrans' only existing freeway express service. It has Omnitrans' best performing route and day combination in terms of passengers per hour. Route 215's productivity on weekends exceeds 40 passengers per hour on Saturday and 35 on Sunday. The result of this high ridership is occasionally a standing load, which is somewhat problematic on a freeway express route compared to traditional local service.

In order to better accommodate this growing and high weekend ridership, it is proposed that frequency for Saturdays and Sundays be increased from 60-minute to 30-minute frequency of service.

Exhibit 129: Route 215 Service Summary

	Weekday	Saturday	Sunday
Peak Vehicles	4	2	2
Frequency	30	30	30
Span	5:05-22:00	6:35-22:00	7:05-19:00
Rev. Hours			
Daily	63.67	29.83	22.83
Annual	16,235	1,551	1,187
Annual Total Revenue Hours	18,974		



**10.5.2 Summary of Potential Freeway Express Routes**

The primary service characteristics of potential freeway express is described in Exhibit 130.

additional freeway express service beyond the existing route 215.

As described above, the revenue hours and costs associated with services are for peak hour service only. Omnitrans passengers have continued to express the need for Freeway Express Service as a way to reduce travel times. Omnitrans plans to continue working with funding partners and refining service in order to begin to introduce

**Exhibit 130: Summary Service Characteristics for Potential Freeway Express Routes**

Route	Day	Frequency		Peak Vehicles			Annual Revenue Hours			Annual Fully Allocated Cost (2013 \$s)		
		Today	Proposed	Today	Proposed	Δ	Today	Proposed	Δ	Today	Proposed	Δ
<b>Freeway Express</b>												
215	Weekday	30/60	30/60	4	4	0	10,223	10,223	0	\$ 952,784	\$ 952,784	\$ -
	Saturday	60	30	1	2	1	802	1,551	749	\$ 74,746	\$ 144,553	\$ 69,807
	Sunday	60	30	1	2	1	620	1,187	567	\$ 57,784	\$ 110,628	\$ 52,844
I-10: SB to Ontario & Montclair	Weekday	n/a	60	0	4	4	0	7,140	7,140	\$ -	\$ 665,448	\$ 665,448
	Saturday	n/a	n/a	0	0	0	0	0	0	\$ -	\$ -	\$ -
	Sunday	n/a	n/a	0	0	0	0	0	0	\$ -	\$ -	\$ -
I-10: Fontana to Ontario & Montclair	Weekday	n/a	60	0	2	2	0	3,570	3,570	\$ -	\$ 332,724	\$ 332,724
	Saturday	n/a	n/a	0	0	0	0	0	0	\$ -	\$ -	\$ -
	Sunday	n/a	n/a	0	0	0	0	0	0	\$ -	\$ -	\$ -
I-10: Yucaipa & Redlands to SB	Weekday	n/a	60	0	2	2	0	3,570	3,570	\$ -	\$ 332,724	\$ 332,724
	Saturday	n/a	n/a	0	0	0	0	0	0	\$ -	\$ -	\$ -
	Sunday	n/a	n/a	0	0	0	0	0	0	\$ -	\$ -	\$ -
<b>Freeway Express Totals</b>							11,645	27,241	15,596	\$ 1,085,314	\$ 2,538,861	\$ 1,453,547

## 10.6 Other Services

Omnitrans operates two additional services beyond the fixed route, BRT and express bus services described above. These two services are Access and OmniLink. Both are dial-a-ride origin-to-destination (curb-to-curb) services.

### 10.6.1 Access Service

Access is Omnitrans' Americans with Disabilities Act (ADA) required complementary paratransit service. The service is required by law to provide service within ¼-mile of Omnitrans fixed routes. Omnitrans does not propose any changes to the Access service; however, the agency is committed to working with VTrans, San Bernardino County's Consolidated Transportation Services Agency (CTSA) when opportunities arise.

In order to mitigate cost growth on Access, Omnitrans does partner with VTrans and many community organizations through Job Access Reverse Commute (JARC, FTA §5316) and New Freedom (FTA §5317) funds so that these partners can offer similar trips that reduce the demand on

Access.

### 10.6.2 OmniLink

OmniLink is a general public dial-a-ride service in Chino Hills and Yucaipa. As discussed in previous sections, OmniLink has been outperformed by OmniGo service in these communities. Using the same resources, OmniGo has been able to deliver a 300% increase in ridership compared to the previously existing OmniLink levels. Generally, the industry trend over the last decade has been an elimination of General Public Dial-a-Ride services because of the inherent cost and inefficiency of these services. In the Unconstrained Plan, Omnitrans does not propose a change to OmniLink, but the service is a likely service reduction should Omnitrans seek additional improvements as outline above due to the duplication with OmniGo Routes.

**Exhibit 131: Summary Service Characteristics for Demand Responsive Services**

Route	Day	Frequency		Peak Vehicles			Annual Revenue Hours			Annual Fully Allocated Cost (2013 \$s)		
		Today	Proposed	Today	Proposed	Δ	Today	Proposed	Δ	Today	Proposed	Δ
<b>Demand Response Services</b>												
Access	Weekday	DR	DR	96	96	0	159,542	159,542	0	\$ 11,030,379	\$ 11,030,379	\$ -
	Saturday	DR	DR	26	26	0	8,642	8,642	0	\$ 600,332	\$ 600,332	\$ -
	Sunday	DR	DR	23	23	0	7,477	7,477	0	\$ 517,910	\$ 517,910	\$ -
OmniLink	Weekday	DR	DR	3	3	0	6,553	6,553	0	\$ 420,473	\$ 420,473	\$ -
	Saturday	n/a	n/a	0	0	0	0	0	0	\$ -	\$ -	\$ -
	Sunday	n/a	n/a	0	0	0	0	0	0	\$ -	\$ -	\$ -
<b>Demand Response Services</b>							182,214	182,214	0	\$ 12,569,094	\$ 12,569,094	\$ -



## 10.7 Capital Plan

Capital projects include infrastructure (such as stops and stations), facilities, technology or equipment purchases, or vehicle purchases. Chapter 7, Financial Plan, shows the financially constrained capital plan for Omnitrans for FY 2015-2020. This reflects the capital expenses that Omnitrans expects to be able to fund based on the funding projections available.

This chapter contains the financially unconstrained capital plan, which reflects the additional capital projects that Omnitrans would like to pursue if additional grant funding becomes available. Grant funding is typically on a short application cycle, so much of the planning has to be done before grant funding can be applied for. In addition to project readiness, grant funding applications are typically awarded more points for local and regional support, local match funding availability (or in-kind support), and potential for reducing greenhouse gas emissions and/or increasing transit mode share (increasing transit ridership).

The OmniConnects plan contains both a service plan and a capital plan. Previous sections of this chapter contained the financially unconstrained service plan, which represents the services Omnitrans would like to provide if additional operating funding should become available. In some cases, additional services bring with them capital costs for vehicles or for new or improved bus stops, so those services are reflected in the unconstrained service plan and in the unconstrained capital plan.

In the development of the OmniConnects plan, Omnitrans' member agencies were asked for input

on suggested capital projects to improve transit service in their communities. The list below is a summary of the projects proposed by member agencies as well as by Omnitrans staff. The proposed projects are sorted into priority order based upon the following criteria:

- ▶ Number of passengers served;
- ▶ Potential to increase ridership;
- ▶ Potential to reduce travel time and increase average speed of operations; and
- ▶ Ease of implementation.

### 10.7.1 Proposed Projects

The proposed projects are as follows:

- ▶ Corridor Improvements:
  - West Valley Connector Corridor (see description below); and
  - Foothill Corridor (see description below).
- ▶ Implementation of new technology such as smart cards or other new fare media system, which will help reduce the amount of cash taken on-board and thereby reduce delays on-board and improve travel times.
- ▶ Vehicles for operating additional services, such as the following:
  - Freeway express routes (requires ongoing operating funding to be identified); and

- 60' articulated vehicles to carry more passengers on high-ridership local bus routes, which will help increase efficiency and reduce overloading.
- ▶ Bus stop improvements:
  - ADA accessibility improvements at bus stops, including ADA-compliant concrete boarding areas, connecting sidewalk, curb ramps, intersection safety improvements and other transit access improvements;
  - Shelters and/or benches, typically prioritized by number of passenger served at stop;
  - Lighting (solar-powered or hard-wired lighting placed inside shelters for safety at bus stops);
  - Trash receptacles (typically placed at stop; located near retail establishments to prevent litter at the bus stop);
  - Electronic real-time arrival information signage, to help ease riders' anxiety while waiting for the bus -- installation of signs is prioritized at stops with the highest ridership (at stops without electronic signs, Omnitrans' NexTrip information is available via the web at <http://www.omnitrans.org/nextrip/>, mobile apps, and a telephone hotline);
  - Pavement rehabilitation and installation of reinforced concrete bus pads at bus stops where high-volume bus traffic has deteriorated the pavement; and

- Bicycle and pedestrian access to transit projects, such as sidewalks, crosswalks, bike lanes, etc. within ½ mile of bus stop.
- ▶ Facilities improvements or operational improvements:
  - Improved or new operating and maintenance facility;
  - Additional security cameras to improve safety and security on routes, at stations, or at facilities;
  - Rooftop solar panels to reduce long-term electricity costs; and
  - Computer equipment, software, or other technology purchases, to improve staff productivity and operational efficiencies.

### 10.7.2 West Valley Connector Corridor

The map in Exhibit 132 shows the sbX bus rapid transit corridors outlined in Omnitrans' 2010 System-Wide Transit Corridor Plan for the San Bernardino Valley and SANBAG's 2010 Long Range Transit Plan. These corridors were identified as having potential for premium transit service, with possible features such as limited stops, enhanced bus stops (stations), and mechanisms for bypassing traffic congestion such as queue jumpers, transit signal priority, and/or dedicated bus lanes. Such service has the potential to greatly increase transit ridership in the Valley by reducing travel times to be more competitive with the automobile and providing connections with rail service and other regional transit systems.

The Holt Boulevard/4th Street (Route 61) corridor, shown in purple in Exhibit 132, is based on Omnitrans' existing local Route 61. The Route 61 currently has the highest ridership in the Omnitrans network (at around 6,100 boardings per average weekday).

The cities of Pomona, Ontario, and Fontana each completed studies in 2012/2013 related to the Holt Avenue/4th Street (Route 61) corridor within their communities. The City of Ontario is the fastest-growing city in Omnitrans' service area, with employment projected to double between 2010 and 2035. Thus, the City of Ontario is anticipating rapidly increasing levels of traffic congestion and is looking forward to offering public transit travel options that are competitive with the private automobile in order to increase the mode share of public transit and alleviate roadway congestion in the long term.

Ontario's City Council adopted the *Holt Boulevard Mobility & Streetscape Strategic Plan* in May 2013, which outlined a vision to integrate transit seamlessly with streetscaping such as community-specific artwork, landscaping, and street furnishings along Holt Boulevard throughout the City limits. The plan calls for 3.5 miles of center-running dedicated transit lanes along a portion of Holt Boulevard that has been identified in City plans for future widening.

Building off of the local support and momentum, Omnitrans applied for and received a grant from the Federal Transit Administration (FTA) to

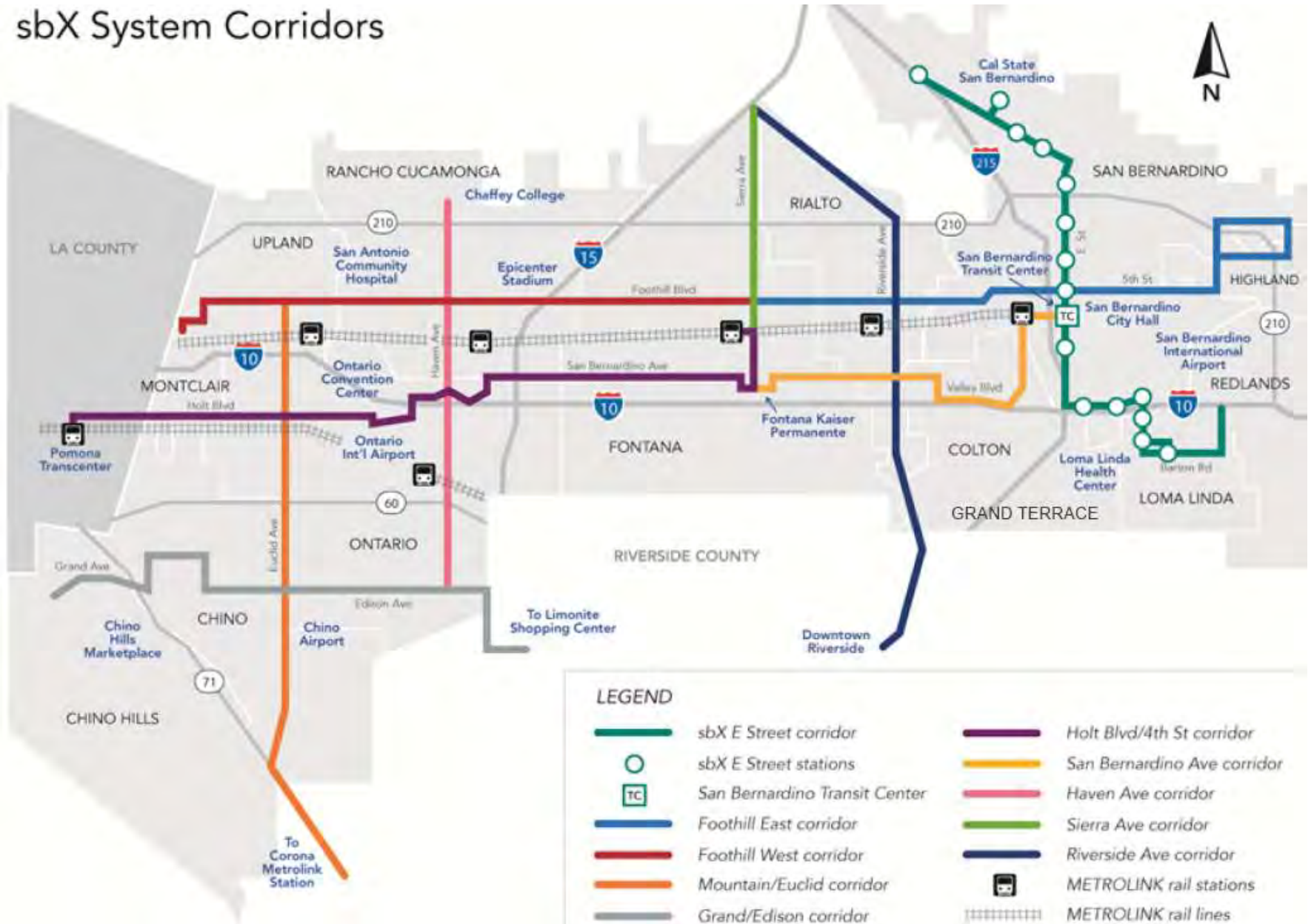
conduct an Alternatives Analysis for the corridor, and started work on it in January 2013.

The project development team (PDT) led by Omnitrans includes representatives of the major stakeholders along the corridor, including the cities of Fontana, Ontario, Rancho Cucamonga, Montclair, and Pomona, the County of San Bernardino, San Bernardino Associated Governments (SANBAG), Southern California Association of Governments (SCAG), LA Metro, Foothill Transit, Metrolink, the Ontario Airport (Los Angeles World Airports), Ontario Mills Mall, and others.

The PDT members and the Parsons consulting team evaluated several initial alternatives and came to a consensus on the corridor alignment, which is shown in Exhibit 133. The West Valley Connector Corridor, as it is now called, combines the Holt/San Bernardino/4th St. Corridor and part of the Foothill Corridor that were originally shown in the System-Wide Transit Corridor Plan for the San Bernardino Valley and in the Long Range Transit Plan. Based upon requests from the public, the cities of Ontario and Rancho Cucamonga, and SANBAG, this altered route provides more direct connections between the Ontario Airport, Ontario Mills Mall, the Rancho Cucamonga Metrolink Station (Metrolink San Bernardino Line), Victoria Gardens, the Fontana Transit Center, and Kaiser Medical Center Fontana.

Exhibit 132: sbX System Corridors

# sbX System Corridors



Produced by Parsons Transportation Group / MIG for Omnitrans Route 61 Alternatives Analysis, 2013

**Exhibit 133: West Valley Connector Corridor Proposed Alignment and Station Locations**



Produced by Parsons Transportation Group and MIG for Omnitrans Route 61 Alternatives Analysis, 2013

The PDT evaluated several alternatives with a wide range of capital costs. A full bus rapid transit (BRT) line similar to the E Street Corridor / sbX Green Line was found to have the most travel time benefits and highest ridership but also the highest cost. Dedicated transit lanes contribute the bulk of the capital cost, which puts a full BRT line out of the affordable cost range.

An initial project definition has been developed out of the Alternatives Analysis process, which includes two phases. Phase I includes Rapid, limited stop service on short headways, with stops spaced at ½ mile to 1 mile apart, improved stations, transit signal priority, and other robust intelligent transportation systems throughout the corridor. Phase II will add 3.5 miles of dedicated, center-running BRT lanes in the City of Ontario and additional station enhancements. Grant funding sources will be sought for both phases. Phase II can potentially be matched with local funds available for widening Holt Boulevard in the City of Ontario.

In Phase I of the project, Rapid improvements will increase ridership along the corridor (currently served by routes 61 and 66) by 30% near-term and will reduce end-to-end travel times by 10%. Adding dedicated lanes in the City of Ontario in Phase II will further increase ridership by another 52% and further reduce travel times by another 10 to 12%. By attracting new riders, the West Valley Connector project will also reduce regional vehicle

miles traveled (VMT) by more than 4.5 million miles per year by 2035.

Given the high level of benefits and ridership that could be provided by a Rapid or BRT project on the West Valley Connector Corridor, Omnitrans staff recommends moving forward with the West Valley Connector Corridor project as the first priority project on the unconstrained service plan and unconstrained capital plan. Because there is not anticipated to be additional operating funding available to operate the West Valley Connector Corridor route, it is recommended to shift operating resources from existing routes in the vicinity of the Corridor, primarily by reducing frequency on local Routes 61 and 66 where they overlap the Corridor. The operating cost is discussed in Chapter 9, Unconstrained Service Plan.

Omnitrans staff recommends the Foothill Central Corridor as the second project on the unconstrained service and capital plans because it provides a connection between the West Valley Connector Corridor and the sbX Green Line. See description below.

### 10.7.3 Foothill Central Corridor (Route 14) Rapid/Limited-Stop Route

In SANBAG's 2010 Long Range Transit Plan, the Foothill East corridor from Fontana to Highland was identified as the corridor with the highest potential future ridership in the Omnitrans system (see sbX Corridor Map in the previous section). In SANBAG's Integrated Transit and Land Use

Planning for the Foothill Boulevard/5th Street/Baseline Road Transit Corridor study completed in 2013, the central section of the Foothill Corridor, from Fontana to San Bernardino was identified as the section with the most near term ridership potential based on the ridership productivity (passengers per hour) on Omnitrans existing local Route 14. The Foothill Central Corridor is shown in red in the map below.

SANBAG's Integrated Transit and Land Use Planning for the Foothill Boulevard/5th Street/Baseline Road Transit Corridor study, 2013 found that a full bus rapid transit (BRT) line along the Foothill Corridor would have the greatest long term benefits and highest projected ridership compared with Rapid/BRT-Lite or limited stop express route options. The study recommended moving forward with a phased approach to implementing the corridor, starting with a limited stop express route and transit signal priority equipment as funds become available, then building up to full BRT in the future.

The initial phase recommended in SANBAG's Integrated Transit and Land Use Planning for the Foothill Boulevard/5th Street/Baseline Road Transit Corridor study is a limited-stop service overlaid on top of existing local service. The operating cost is discussed in Chapter 9 Unconstrained Service Plan.

Exhibit 134: Map of Foothill West and Foothill East Corridors



Produced by TMD for SANBAG's Integrated Transit and Land Use Planning for the Foothill Boulevard/5th Street/Baseline Road Transit Corridor study, 2013

## 10.7.4 Freeway Express Routes

Omnitrans has identified service options for Freeway Express Routes in Section 10.5. The ability to deliver these routes may hinge on the realized savings generated from a proposed elimination of OmniLink.

The capital needs for implementing freeway express routes are also derived directly from current proposed savings. As sbX is implemented, Omnitrans is reducing Route 2 service. This reduces Omnitrans revenue vehicle needs by five vehicles. If the operating savings are found and established by the end of FY2015, Omnitrans will be able to repurpose the vehicles coming off of Route 2 service for freeway express service. Thus adding no additional capital costs for implementing one of the four potential freeway express routes.

## 10.8 Constrained Capital Plan

The constrained capital plan was presented Chapter 7. It focused on the funding necessary to delivery planned replacements or improvements to:

- ▶ Revenue Vehicles;
- ▶ Service Vehicles;
- ▶ Management Information Systems;
- ▶ Facilities; and,
- ▶ Transit Enhancements.

The largest component of the capital plan is the replacement of revenue vehicles. During the period of FY2015-2020, Omnitrans anticipates replacing 15 fixed route 40-foot buses per year and also 15 smaller Access/OmniGo vehicles per year. These are determined based on maintaining the size of the current fleet while also responding to the useful life of a vehicle

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# 11 CONSTRAINED SERVICE PLAN

The OmniConnects Constrained Plan is the proposed implementation plan derived based on the forecasted revenue presented in the Financial Plan and the desired services detailed in the Unconstrained Plan.

The Constrained Plan proposals are designed to be implemented with the adoption of each annual service element. The FY2015 Service Element is directly derived from the Constrained Plan, and each subsequent annual service element will begin with the proposals in the Constrained Plan and be adjusted based on community developments, ridership needs and financial adjustments.

The key elements of the Constrained Plan are:

- ▶ **Proposed Service Changes:** Route, Route Map, Service Hours and Frequency Changes
- ▶ **Estimated Service Levels:** Hours and Miles of service offered
- ▶ **Estimated Performance:** Ridership and Fare Revenue
- ▶ **Planned Questions:** Recommend follow up evaluations that must be conducted based on the initial service changes.

## 11.1 Key Constrained Plan Considerations

OmniTrans’ revenue forecasts were developed through the completion of the Comprehensive Operational Analysis (COA) and described in the OmniConnects Financial Plan. The expected

revenue is sufficient for OmniTrans to maintain the current overall service level. This generally means that OmniTrans can afford to maintain current systemwide revenue hours, but does not have the financial resources to expand revenue hours beyond the planned addition of sbX service. As a result, any proposed increase in service in one area or in a specific family of service, must be funded through savings and efficiencies in another service.

Through the completion of the COA, the development and refinement of performance metrics and the formation of the unconstrained plan, OmniTrans has developed two years of specific proposed changes for FY2015 and FY2016 that are outlined in this chapter.

For subsequent years, the OmniConnects Constrained Plan poses key questions to be answered in the development of the following years’ annual service elements. This approach is taken because the service changes that will be proposed in FY2017 through FY2020 will be based on the outcome of the changes proposed and implemented in FY2015 and FY2016. Since these outcomes cannot be adequately predicted before they are implemented, it is more advantageous to establish the questions for later years rather than assuming the answer.

Since OmniTrans’ overall service levels remain constant through FY2020, the driving assumptions of the revenue and ridership forecasts are:

- ▶ **Proposed fare increases** as detailed in Chap 13 Fare Policy. Each one-percent fare increase creates a 0.36 percent reduction in riders during the following year. Typically, riders recovers during years two and three. Each the proposed fare increases with OmniConnects is spaced two years apart, as a result, ridership levels are not projected to fully recover prior to the subsequent fare increase. This leaves most of OmniTrans services with a downward forecast ridership, but expected growth in fare revenue.
- ▶ **Conservative Organic Growth:** OmniTrans existing fixed route services are expected to see organic growth in the absence of other factors of approximately one percent per year. This one percent organic growth matches historical data and also tracks with the expected increase in population within OmniTrans’ service area.
- ▶ **sbX:** Within OmniConnects, OmniTrans estimates sbX ridership to remain constant the projected opening year levels with the exception of responding to fare changes. This is a conservative forecast and is chosen because: 1) OmniTrans does not currently have historic data as a base for sbX growth rate and, 2) the growth drivers for sbX will come from land-use and density changes in Transit Oriented Developments built around static and also from expected increased congestion in the area that will make sbX travel time more competitive. In a longer term 10 to 20 year

forecast, it is somewhat easier to estimate these changes will occur. In a short-term forecast, it is difficult to predict in which year these changes will truly begin to take place. As a result, the forecasts for sbX are conservatively static by design and do not assume immediate land-use or density changes.

- ▶ **Access:** The continued aging of the population and the continued increase in Access ADA applications combined with the recent history of typical two percent to six percent annual increases in Access ridership over the last five years present Omnitrans with an expected organic growth in Access ridership of three percent per year. This growth may be mitigated by the proposed fare increases, a change to the eligibility process, such as in-person functional eligibility assessments, and the further development of partnerships with organizations like VTrans. VTrans seeks to provide travel training to encourage migration from Access for fixed route service; and though funding partnership with health and human services organizations to provide transportation options other than Access.

## 11.2 FY2015 Service Proposals

The FY2015 proposed service changes center on strengthening the east-west connections to the sbX Green line in order to expand the reach of the travel time improvements brought on by sbX to riders traveling from Yucaipa, Redlands, Highland, Loma Linda and San Bernardino. Strong westward connections to sbX already exist through Route 14. Funding for improvements on the east-west connections to sbX are found by eliminating

routing redundancies. The FY2015 proposals are focused on East Valley routes in order to take advantage of sbX opportunities. The FY2016 proposals are focused on West Valley service improvements.

The following is a list of FY2015 proposals, which if approved would be implemented on September 2, 2014:

### Fare Proposals

- ▶ Implementation of the 16.7% increase in base fare and corresponding fares detailed in the fare Policy Chapter.

### Frequency and Timing Changes

- ▶ Reduce weekday frequency on Route 20 to 60 minute frequency from 30 minute frequency due to low ridership as described in the unconstrained plan.
- ▶ Improve frequency and reliability on routes 3/4 to 15 minutes for the majority of the day from 20 minute morning service and 15 minute afternoon service as described in the Unconstrained Plan.
- ▶ Improve weekend frequency on Route 215 to 30 minute service from 60 minute service due to high and growing ridership as described in the unconstrained plan.
- ▶ Reschedule Route 61 to improve travel times and eliminate unnecessary dwell time.

### Service Eliminations

- ▶ Eliminate all remaining OmniLink service due to redundancy with OmniGo service.

### Primarily Map Changes

- ▶ Merging of Route 9 and 19 into the newly proposed Route 19 to improve frequency on Yucaipa Boulevard and Barton Rd. creating an east-west connection to sbX on Barton Road from Yucaipa to Fontana as described in the Unconstrained Plan.
- ▶ Restructure Route 5 south of Pacific High School in San Bernardino to serve as a direct north-south route on Waterman Avenue to Redlands Boulevard. Route 5 will bypass the main downtown hub in San Bernardino, but connecting routes offer seven transfer opportunities. This change improves travel directness and frequency on Waterman. This change covers the lost sections of Route 9 that previously traveled into San Bernardino. These changes are also detailed in the Unconstrained Plan.
- ▶ Create a short and long route 8 that improves frequency to 30 minutes from Redlands to San Bernardino, providing a strong connection to sbX on Redlands Boulevard, while offering a long route with 60 minute service to Crafton Hills College. The route would no longer travel to the Yucaipa Transit Center, but this would be replaced by the improved frequency on Route 19; as described in the Unconstrained Plan.
- ▶ Create bi-directional ingress and egress on Valley Boulevard. to Arrowhead Regional Medical Center for Route 22 rather than having a loop to San Bernardino Avenue.

Each of the proposed map changes are described in the following exhibits.

Exhibit 136: Route 5 Map Change



Exhibit 135: Route 22 Map Change



**Exhibit 137: Route 8 Map Change**



**Exhibit 138: Route 19 (9 & 19) Map Change**



### 11.3 FY2015 Ridership, Fare Revenue and Service Level Forecasts

The following nine tables are based on the service changes proposed above and the assumptions described in Section 11.1 Key Constrained Plan Considerations. The primary drivers of the forecasts are the introduction of sbX service and the fare increase. They take a conservative approach to forecasting ridership described above in Section 11.1.

**System Total (All Services, Fixed Route, OmniGo, OmniLink, sbX, and Contracted Weekend)**

System Total (in Thousands except vehicles and ratios)		Actuals				Estimated	Projection	Change
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2015
<b>Financial</b>	<b>Fare Revenue</b>	\$ 14,527	\$ 15,053	\$ 14,930	\$ 14,738	\$ 14,857	\$ 17,418	17.2%
<b>Operating Data</b>	<b>Revenue Miles</b>	10,810	10,598	10,851	10,866	10,786	11,173	3.6%
	<b>Total Miles</b>	12,155	11,817	12,019	12,073	11,967	12,311	2.9%
	<b>Revenue Hours</b>	807	783	796	797	793	812	2.4%
	<b>Total Hours</b>	884	857	868	870	865	881	1.8%
	<b>Passengers</b>	14,751	14,891	16,152	16,146	15,951	16,413	2.9%
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>	237	236	241	241	252	247	-2.0%
<b>Key Stats</b>	<b>Passengers per Hour</b>	18.3	19.0	20.3	20.3	20.1	20.2	0.5%

Note: Fare Revenue includes the Measure I Fare Subsidy for Senior and Disabled Riders.

**All Fixed Route (40', sbX, OmniGo and Contracted Weekend)**

Total Fixed Route (in Thousands except vehicles and ratios)		Actuals				Estimated	Projection	Change
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2015
<b>Financial</b>	<b>Fare Revenue</b>	\$ 13,137	\$ 13,530	\$ 13,359	\$ 13,153	\$ 13,260	\$ 15,697	18.4%
<b>Operating Data</b>	<b>Revenue Miles</b>	8,274	7,929	7,910	7,861	7,945	8,449	6.3%
	<b>Total Miles</b>	8,901	8,560	8,555	8,508	8,597	9,084	5.7%
	<b>Revenue Hours</b>	638	615	612	614	619	645	4.3%
	<b>Total Hours</b>	667	643	641	642	647	674	4.1%
	<b>Passengers</b>	14,307	14,437	15,674	15,655	15,456	15,939	3.1%
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>	139	138	143	143	154	149	-3.2%
<b>Key Stats</b>	<b>Passengers per Hour</b>	22.4	23.5	25.6	25.5	25.0	24.7	-1.1%

Note: Fare Revenue includes the Measure I Fare Subsidy for Senior and Disabled Riders.

**All Demand Response (Access & OmniLink)**

Total Demand Response (in Thousands except vehicles and ratios)		Actuals				Estimated	Projection	Change
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2015
<b>Financial</b>	<b>Fare Revenue</b>	\$ 1,389	\$ 1,523	\$ 1,571	\$ 1,585	\$ 1,598	\$ 1,722	7.8%
<b>Operating Data</b>	<b>Revenue Miles</b>	2,536	2,669	2,940	3,005	2,841	2,724	-4.1%
	<b>Total Miles</b>	3,255	3,257	3,464	3,564	3,370	3,227	-4.2%
	<b>Revenue Hours</b>	168	169	184	182	174	167	-4.6%
	<b>Total Hours</b>	217	214	228	227	218	207	-5.0%
	<b>Passengers</b>	445	454	478	491	495	475	-4.1%
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>	98	98	98	98	98	98	0.0%
<b>Key Stats</b>	<b>Passengers per Hour</b>	2.6	2.7	2.6	2.7	2.8	2.8	0.5%

**Traditional Fixed Route**

Motor Bus Directly Operated (MBDO) Excludes sbX (in Thousands except vehicles and ratios)		Actuals				Estimated	Projection	Change
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2015
<b>Financial</b>	<b>Fare Revenue</b>	\$ 13,137	\$ 13,461	\$ 13,249	\$ 13,031	\$ 13,121	\$ 14,324	9.2%
<b>Operating Data</b>	<b>Revenue Miles</b>	8,274	7,650	7,550	7,491	7,485	7,526	0.5%
	<b>Total Miles</b>	8,901	8,236	8,137	8,074	8,068	8,081	0.2%
	<b>Revenue Hours</b>	638	593	585	587	586	586	0.0%
	<b>Total Hours</b>	667	619	612	613	612	611	-0.2%
	<b>Passengers</b>	14,307	14,320	15,523	15,510	15,055	14,324	-4.9%
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>	139	131	136	136	136	131	-3.7%
<b>Key Stats</b>	<b>Passengers per Hour</b>	22.4	24.2	26.5	26.4	25.7	24.4	-4.9%

**sbX**

Bus Rapid Transit (BRT) sbX (Not included in MBDO or MBPT)		Actuals				Estimated	Projection	Change
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2015
<b>Financial</b>	<b>Fare Revenue</b>					\$ -	\$ 1,221	
<b>Operating Data</b>	<b>Revenue Miles</b>					92	553	501.1%
	<b>Total Miles</b>					97	570	487.6%
	<b>Revenue Hours</b>					5	31	502.0%
	<b>Total Hours</b>					6	32	490.0%
	<b>Passengers</b>					233	1,454	524.0%
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>					11	11	0.0%
<b>Key Stats</b>	<b>Passengers per Hour</b>					45.7	51.9	13.7%

**OmniGo and Contracted Weekend Fixed Route**

Motor Bus Purchased Transportation (MBPT) (in Thousands except vehicles and ratios)		Actuals				Estimated	Projection	Change
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2015
<b>Financial</b>	<b>Fare Revenue</b>		\$ 69	\$ 110	\$ 122	\$ 139	\$ 151	8.3%
<b>Operating Data</b>	<b>Revenue Miles</b>		279	360	370	368	370	0.6%
	<b>Total Miles</b>		324	417	434	432	433	0.3%
	<b>Revenue Hours</b>		22	27	28	28	28	2.6%
	<b>Total Hours</b>		24	29	30	30	30	2.7%
	<b>Passengers</b>		117	150	145	168	160	-4.9%
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>		7	7	7	7	7	0.0%
<b>Key Stats</b>	<b>Passengers per Hour</b>		5.3	5.5	5.2	6.1	5.7	-7.3%

**Access**

Access (in Thousands except vehicles and ratios)		Actuals				Estimated	Projection	Change
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2015
<b>Financial</b>	<b>Fare Revenue</b>	\$ 1,298	\$ 1,473	\$ 1,532	\$ 1,551	\$ 1,566	\$ 1,717	9.6%
<b>Operating Data</b>	<b>Revenue Miles</b>	2,376	2,568	2,845	2,918	2,755	2,710	-1.6%
	<b>Total Miles</b>	3,011	3,119	3,346	3,456	3,263	3,209	-1.6%
	<b>Revenue Hours</b>	154	160	177	176	168	165	-1.6%
	<b>Total Hours</b>	197	202	218	218	209	205	-1.6%
	<b>Passengers</b>	399	431	459	473	477	472	-1.1%
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>	90	95	95	95	95	95	0.0%
<b>Key Stats</b>	<b>Passengers per Hour</b>	2.6	2.7	2.6	2.7	2.8	2.85	0.5%

**OmniLink Yucaipa**

OmniLink-Yucaipa (in Thousands except vehicles and ratios)		Actuals				Estimated	Projection	Change
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2015
<b>Financial</b>	<b>Fare Revenue</b>	\$ 66	\$ 37	\$ 28	\$ 25	\$ 22	\$ 4	-83.3%
<b>Operating Data</b>	<b>Revenue Miles</b>	109	67	62	57	53	9	-83.3%
	<b>Total Miles</b>	166	91	76	70	65	11	-83.3%
	<b>Revenue Hours</b>	10	5	4	4	4	1	-83.3%
	<b>Total Hours</b>	13	7	6	6	6	1	-83.3%
	<b>Passengers</b>	33	18	14	14	13	2	-83.3%
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>	5	2	2	2	2	2	0.0%
<b>Key Stats</b>	<b>Passengers per Hour</b>	3.3	3.3	3.2	3.1	3.2	3.2	0.0%

**OmniLink Chino Hills**

OmniLink-Chino Hills		Actuals				Estimated	Projection	Change
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2015
<b>Financial</b>	<b>Fare Revenue</b>	\$ 25	\$ 13	\$ 11	\$ 9	\$ 10	\$ 2	-83.3%
<b>Operating Data</b>	<b>Revenue Miles</b>	51	34	34	30	34	6	-83.3%
	<b>Total Miles</b>	77	47	42	38	43	7	-83.3%
	<b>Revenue Hours</b>	5	3	2	2	2	0	-83.3%
	<b>Total Hours</b>	7	4	3	3	3	1	-83.3%
	<b>Passengers</b>	13	6	5	5	5	1	-83.3%
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>	3	1	1	1	1	1	0.0%
<b>Key Stats</b>	<b>Passengers per Hour</b>	2.6	2.2	2.1	2.2	2.2	2.2	0.0%



## 11.4 FY2016 Service Proposals

The FY2016 service change proposals center on improving travel directness in West Valley. Specifically the proposals focus on improving the north-south connections to the key east-west high frequency Routes 66 and 61 on Foothill Blvd and Holt Avenue.

The proposals seek to reduce redundancy on many routes or routes that provide similar connections. The proposals seek to straighten Omnitrans routes to make the routes much easier to understand for new riders.

The outcome of the route design changes is a move closer to a grid system in West Valley, although the key hub connections still exist.

### Fare Proposals

- ▶ There are no fare change proposals in FY2016.

### Frequency and Timing Changes

- ▶ There are no independent frequency changes in FY2016. Frequency changes on Routes 65 and 68 are coupled with map changes to both routes.

### Service Eliminations

- ▶ There are no service eliminations proposed for FY2016.

### Primarily Map Changes

- ▶ Route 63 is proposed to become a more direct north-south route serving Mountain Avenue between Chino, Ontario and Upland rather than a meandering route that provides duplicative service on Holt. This change was proposed in the Unconstrained Plan.

- ▶ Route 65 and Route 68 switch segments in order to match higher ridership segments with higher frequency segments. Route 65 is proposed to provide service on Central Avenue and Arrow Highway before connecting North to Chaffey College by adding service on Archibald Ave with 30 minute service. Route 68 becomes an hour route connecting Chino Hills to Montclair Transit Center by traveling on Ramona Avenue. Route 68 service is provided at a 60 minute frequency. Both changes were described in the Unconstrained Plan.

- ▶ Route 67 is shortened to provide a direct connection between Fontana and Chaffey College with primary path of travel on Baseline. The route no longer continues on Baseline to Upland and the Montclair Transit Center. This change is due to growing ridership at Chaffey and due to low ridership on Baseline west of Milliken. This change was described in the Unconstrained Plan.

- ▶ Route 80 service is shortened between downtown Ontario and Chaffey College rather than continuing from Chaffey College to Montclair Transit Center. The reason for this is there are currently three routes that connect Holt Boulevard. to the Montclair Transit Center. None of the three is particularly strong in terms of passengers per hour or farebox recovery and this proposal helps to grow ridership on the remaining two routes. This modifies the proposal in the Unconstrained Plan to make the totality of the proposed changes fall within the constrained budget.

- ▶ Route 81 service is proposed to travel from Chaffey College to Chino Transit Center using direct path of Haven north-south and Riverside Dr. east-west. This greatly straightens the existing Route 81.
- ▶ Route 82 service is proposed to travel Milliken Ave. between Jurupa Ave and Foothill Blvd rather than meandering back and forth between Milliken Ave. and Haven Ave.
- ▶ Route 83 is extended south on Euclid Avenue to serve the College Park development planned during the development of College Park.
- ▶ Route 84 is a new route that is comprised of portions of the old route 81 and old route 82 to maintain coverage. Route 84 travels from Ontario into Upland on Vineyard Ave and Campus Ave.

Each of the proposed map changes are described in the exhibits on the following pages.

### Key Questions for Consideration

These potential route changes are dependent on the results of data derived from previously implemented service changes or capital projects. The following questions will be asked:

- ▶ Has ridership shifted sufficiently from Route 2 to sbX to consider shifting resources from route 2 to sbX later evening or weekend services or to other areas?
- ▶ What is the status of the San Bernardino Transit Center and the Downtown San Bernardino Passenger Rail Project to the San

Bernardino Transit Center? Prepare routing proposals for Downtown San Bernardino based on the rail improvements.

- ▶ The FY2015 changes moved Route 5 from a hub and spoke route to a grid based route on Waterman. Was that change successful? Should more routes see similar changes or should Route 5 reconnect to downtown?
- ▶ What were the archived savings from the proposed elimination of OmniLink? Were the savings sufficient as planned for the development and deployment of one freeway express route?
- ▶ What is the status of the Goldline Extension to Azusa? If Omnitrans can provide one freeway express route, should it focus on improving intra-county or inter-county travel?

Additional questions will be derived during Omnitrans' regular performance monitoring process.

The proposed map changes are illustrated in the exhibits below.

Exhibit 139: Route 67 Map Change

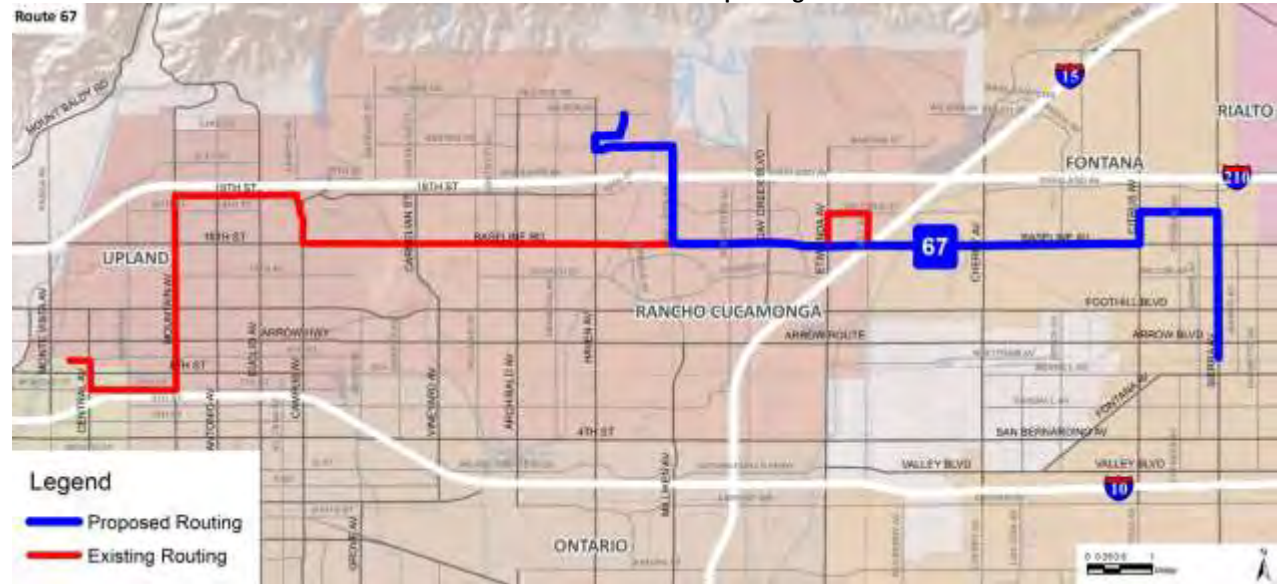


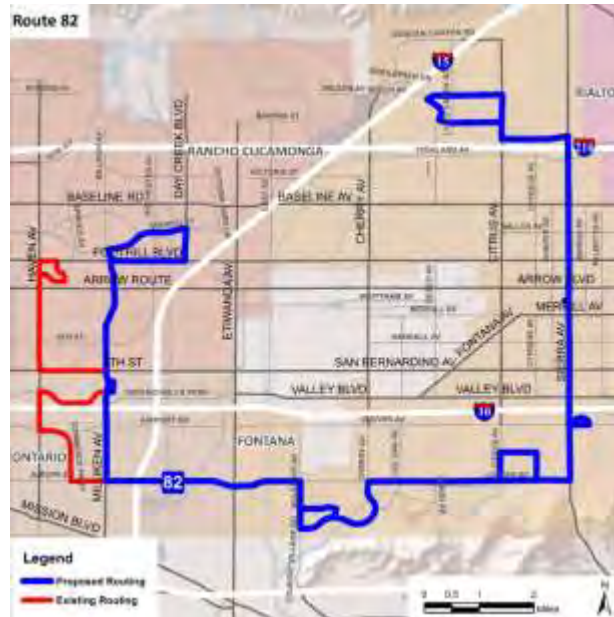
Exhibit 141: Route 83 Map Change



Exhibit 140: Route 81 Map Change



**Exhibit 142: Route 82 Map Change**



**Exhibit 144: Routes 65 & 68 Map Changes**



**Exhibit 143: Route 63 Map Changes**



**Exhibit 145: New Route 84 Map**



**Exhibit 146: Route 80 Map Change**



### 11.5 FY2016 Ridership, Fare Revenue and Service Level Forecasts

The following seven tables are based on the service changes proposed above and the assumptions described in Section 11.1 Key Constrained Plan Considerations. The primary drivers of the forecasts are the introduction of sbX service and the fare increase. They take a conservative approach to forecasting ridership as described above in Section 11.1.

**System Total (All Services, Fixed Route, OmniGo, OmniLink, sbX, and Contracted Weekend)**

System Total (in Thousands except vehicles and ratios)		Actuals				Estimated	Projection		Change
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2016
<b>Financial</b>	<b>Fare Revenue</b>	\$ 14,527	\$ 15,053	\$ 14,930	\$ 14,738	\$ 14,857	\$ 17,418	\$ 17,841	2.4%
<b>Operating Data</b>	<b>Revenue Miles</b>	10,810	10,598	10,851	10,866	10,786	11,173	11,212	0.3%
	<b>Total Miles</b>	12,155	11,817	12,019	12,073	11,967	12,311	12,352	0.3%
	<b>Revenue Hours</b>	807	783	796	797	793	812	815	0.4%
	<b>Total Hours</b>	884	857	868	870	865	881	884	0.4%
	<b>Passengers</b>	14,751	14,891	16,152	16,146	15,951	16,413	16,508	0.6%
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>	237	236	241	241	252	247	244	-1.2%
<b>Key Stats</b>	<b>Passengers per Hour</b>	18.3	19.0	20.3	20.3	20.1	20.2	20.3	0.2%

Note: Fare Revenue includes the Measure I Fare Subsidy for Senior and Disabled Riders.

**All Fixed Route (40', sbX, OmniGo and Contracted Weekend)**

Total Fixed Route (in Thousands except vehicles and ratios)		Actuals				Estimated	Projection		Change
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2016
<b>Financial</b>	<b>Fare Revenue</b>	\$ 13,137	\$ 13,530	\$ 13,359	\$ 13,153	\$ 13,260	\$ 15,697	\$ 16,072	2.4%
<b>Operating Data</b>	<b>Revenue Miles</b>	8,274	7,929	7,910	7,861	7,945	8,449	8,482	0.4%
	<b>Total Miles</b>	8,901	8,560	8,555	8,508	8,597	9,084	9,120	0.4%
	<b>Revenue Hours</b>	638	615	612	614	619	645	648	0.5%
	<b>Total Hours</b>	667	643	641	642	647	674	677	0.5%
	<b>Passengers</b>	14,307	14,437	15,674	15,655	15,456	15,939	16,024	0.5%
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>	139	138	143	143	154	149	149	0.0%
<b>Key Stats</b>	<b>Passengers per Hour</b>	22.4	23.5	25.6	25.5	25.0	24.7	24.7	0.1%

Note: Fare Revenue includes the Measure I Fare Subsidy for Senior and Disabled Riders.

**All Demand Response (Access & OmniLink)**

Total Demand Response (in Thousands except vehicles and ratios)		Actuals				Estimated	Projection		Change
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2016
<b>Financial</b>	<b>Fare Revenue</b>	\$ 1,389	\$ 1,523	\$ 1,571	\$ 1,585	\$ 1,598	\$ 1,722	\$ 1,769	2.7%
<b>Operating Data</b>	<b>Revenue Miles</b>	2,536	2,669	2,940	3,005	2,841	2,724	2,730	0.2%
	<b>Total Miles</b>	3,255	3,257	3,464	3,564	3,370	3,227	3,233	0.2%
	<b>Revenue Hours</b>	168	169	184	182	174	167	167	0.1%
	<b>Total Hours</b>	217	214	228	227	218	207	207	0.0%
	<b>Passengers</b>	445	454	478	491	495	475	483	1.9%
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>	98	98	98	98	98	98	95	-3.1%
<b>Key Stats</b>	<b>Passengers per Hour</b>	2.6	2.7	2.6	2.7	2.8	2.8	2.9	1.8%

Note: Fare Revenue includes the Measure I Fare Subsidy for Senior and Disabled Riders.

**Traditional Fixed Route**

Motor Bus Directly Operated (MBDO) Excludes sbX (in Thousands except vehicles and ratios)		Actuals				Estimated	Projection		Change
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2016
<b>Financial</b>	<b>Fare Revenue</b>	\$ 13,137	\$ 13,461	\$ 13,249	\$ 13,031	\$ 13,121	\$ 14,324	\$ 14,691	2.6%
<b>Operating Data</b>	<b>Revenue Miles</b>	8,274	7,650	7,550	7,491	7,485	7,526	7,556	0.4%
	<b>Total Miles</b>	8,901	8,236	8,137	8,074	8,068	8,081	8,113	0.4%
	<b>Revenue Hours</b>	638	593	585	587	586	586	589	0.5%
	<b>Total Hours</b>	667	619	612	613	612	611	614	0.5%
	<b>Passengers</b>	14,307	14,320	15,523	15,510	15,055	14,324	14,403	0.6%
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>	139	131	136	136	136	131	131	0.0%
<b>Key Stats</b>	<b>Passengers per Hour</b>	22.4	24.2	26.5	26.4	25.7	24.4	24.4	0.0%

Note: Fare Revenue includes the Measure I Fare Subsidy for Senior and Disabled Riders.

**sbX**

Bus Rapid Transit (BRT) sbX (Not included in MBDO or MBPT)		Actuals				Estimated	Projection		Change
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2016
<b>Financial</b>	<b>Fare Revenue</b>					\$ -	\$ 1,221	\$ 1,226	0.4%
<b>Operating Data</b>	<b>Revenue Miles</b>					92	553	555	0.4%
	<b>Total Miles</b>					97	570	572	0.4%
	<b>Revenue Hours</b>					5	31	31	0.4%
	<b>Total Hours</b>					6	32	33	0.4%
	<b>Passengers</b>					233	1,454	1,460	0.4%
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>					11	11	11	0.0%
<b>Key Stats</b>	<b>Passengers per Hour</b>					45.7	51.9	47.4	-8.8%

Note: Fare Revenue includes the Measure I Fare Subsidy for Senior and Disabled Riders.

**OmniGo and Contracted Weekend Fixed Route**

Motor Bus Purchased Transportation (MBPT) (in Thousands except vehicles and ratios)		Actuals				Estimated	Projection		Change
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2016
<b>Financial</b>	<b>Fare Revenue</b>		\$ 69	\$ 110	\$ 122	\$ 139	\$ 151	\$ 155	2.7%
<b>Operating Data</b>	<b>Revenue Miles</b>		279	360	370	368	370	371	0.2%
	<b>Total Miles</b>		324	417	434	432	433	434	0.2%
	<b>Revenue Hours</b>		22	27	28	28	28	28	0.2%
	<b>Total Hours</b>		24	29	30	30	30	30	0.2%
	<b>Passengers</b>		117	150	145	168	160	161	0.6%
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>		7	7	7	7	7	7	0.0%
<b>Key Stats</b>	<b>Passengers per Hour</b>		5.3	5.5	5.2	6.1	5.7	5.7	0.3%

Note: Fare Revenue includes the Measure I Fare Subsidy for Senior and Disabled Riders.

**Access**

Access (in Thousands except vehicles and ratios)		Actuals				Estimated	Projection		Change
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2016
<b>Financial</b>	<b>Fare Revenue</b>	\$ 1,298	\$ 1,473	\$ 1,532	\$ 1,551	\$ 1,566	\$ 1,717	\$ 1,769	3.1%
<b>Operating Data</b>	<b>Revenue Miles</b>	2,376	2,568	2,845	2,918	2,755	2,710	2,730	0.7%
	<b>Total Miles</b>	3,011	3,119	3,346	3,456	3,263	3,209	3,233	0.7%
	<b>Revenue Hours</b>	154	160	177	176	168	165	167	0.7%
	<b>Total Hours</b>	197	202	218	218	209	205	207	0.7%
	<b>Passengers</b>	399	431	459	473	477	472	483	2.5%
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>	90	95	95	95	95	95	95	0.0%
<b>Key Stats</b>	<b>Passengers per Hour</b>	2.6	2.7	2.6	2.7	2.8	2.85	2.9	1.8%

Note: Fare Revenue includes the Measure I Fare Subsidy for Senior and Disabled Riders.

## 11.6 FY2017-FY2020 Service Considerations

As described in the introduction to the Constrained Plan, OmniConnects does not propose detailed service changes for the FY2017-FY2020 time frame. Changes during this period will be driven by the goals established of improving travel time and directness of travel while working to shift Omnitrans resource allocation to a 65% productivity-oriented allocation.

Omnitrans' proposals from FY2017-FY2020 will be driven by the performance monitoring program outlined within OmniConnects.

Omnitrans will monitor many key developments to see how projects are progressing. Omnitrans will actively seek to improve travel times though the implementation of limited stop, rapid or BRT-light services that are detailed in the Unconstrained Plan.

Key considerations for FY2017 and beyond include:

- ▶ Funding availability for capital improvements to implement BRT-light on the West Valley Connector Corridor. Should the capital funding be found, Omnitrans' service plan would seek to restructure Routes 61 and 66 to free up resources to fund the operating costs of the West Valley Connector.
- ▶ What is the status of revenue service on Redlands Rail? Omnitrans would seek to structure feeder service in Redlands, Yucaipa and Highland to build a multi-modal connection at the Downtown Redlands Rail

Station. Additional resources would be needed for significant improvement, but restructuring of Route 8 which parallels Redlands rail maybe possible depending on the rail services fare and frequency.

- ▶ Monitoring of the new West Valley north-south routes to determine if one of the routes clearly outperforms the others in order to develop strong transfer connections and continue the move to a grid based system.

Since many of these changes are dependent on the outcomes of others or on the outcomes of Omnitrans' previous proposals, specific recommendations are not made here.

Based on normal scheduling, Omnitrans next SRTP would be scheduled to be completed in FY2017 or FY2018 and would address these issues moving forward.

Proposed FY2017-FY 2020 fare changes:

- ▶ FY2017: The Fare Policy Chapter proposes a 14% increase in the fixed route base fare from \$1.75 to \$2.00 and a corresponding increase in other fares.
- ▶ FY2019: The Fare Policy Chapter proposes a 12% increase in fixed route base fare from \$2.20 to \$2.25 and a corresponding increase in other fares.

These fare increases are assumed in the six year ridership, fare revenue and service assumption detailed on the next few pages.

### 11.7 OmniConnects Six Year Forecasts

**System Total (All Services, Fixed Route, OmniGo, OmniLink, sbX, and Contracted Weekend)**

System Total (in Thousands except vehicles and ratios)		Actuals				Estimated	Projection					
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020
<b>Financial</b>	<b>Fare Revenue</b>	\$ 14,527	\$ 15,053	\$ 14,930	\$ 14,738	\$ 14,857	\$ 17,418	\$ 17,841	\$ 18,774	\$ 19,249	\$ 20,174	\$ 20,675
<b>Operating Data</b>	<b>Revenue Miles</b>	10,810	10,598	10,851	10,866	10,786	11,173	11,212	11,178	11,246	11,241	11,319
	<b>Total Miles</b>	12,155	11,817	12,019	12,073	11,967	12,311	12,352	12,314	12,396	12,389	12,480
	<b>Revenue Hours</b>	807	783	796	797	793	812	815	812	817	816	821
	<b>Total Hours</b>	884	857	868	870	865	881	884	881	886	886	892
	<b>Passengers</b>	14,751	14,891	16,152	16,146	15,951	16,413	16,508	15,954	16,050	15,548	15,651
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>	237	236	241	241	252	247	244	244	244	244	244
<b>Key Stats</b>	<b>Passengers per Hour</b>	18.3	19.0	20.3	20.3	20.1	20.2	20.3	19.6	19.7	19.0	19.1

Note: Fare Revenue includes the Measure I Fare Subsidy for Senior and Disabled Riders.

**All Fixed Route (40', sbX, OmniGo and Contracted Weekend)**

Total Fixed Route (in Thousands except vehicles and ratios)		Actuals				Estimated	Projection					
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020
<b>Financial</b>	<b>Fare Revenue</b>	\$ 13,137	\$ 13,530	\$ 13,359	\$ 13,153	\$ 13,260	\$ 15,697	\$ 16,072	\$ 16,915	\$ 17,318	\$ 18,123	\$ 18,542
<b>Operating Data</b>	<b>Revenue Miles</b>	8,274	7,929	7,910	7,861	7,945	8,449	8,482	8,464	8,465	8,464	8,472
	<b>Total Miles</b>	8,901	8,560	8,555	8,508	8,597	9,084	9,120	9,100	9,101	9,100	9,109
	<b>Revenue Hours</b>	638	615	612	614	619	645	648	647	647	647	647
	<b>Total Hours</b>	667	643	641	642	647	674	677	675	675	675	676
	<b>Passengers</b>	14,307	14,437	15,674	15,655	15,456	15,939	16,024	15,474	15,558	15,056	15,147
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>	139	138	143	143	154	149	149	149	149	149	149
<b>Key Stats</b>	<b>Passengers per Hour</b>	22.4	23.5	25.6	25.5	25.0	24.7	24.7	23.9	24.1	23.3	23.4

**All Demand Response (Access & OmniLink)**

Total Demand Response (in Thousands except vehicles and ratios)		Actuals				Estimated	Projection					
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020
<b>Financial</b>	<b>Fare Revenue</b>	\$ 1,389	\$ 1,523	\$ 1,571	\$ 1,585	\$ 1,598	\$ 1,722	\$ 1,769	\$ 1,860	\$ 1,931	\$ 2,051	\$ 2,132
<b>Operating Data</b>	<b>Revenue Miles</b>	2,536	2,669	2,940	3,005	2,841	2,724	2,730	2,714	2,782	2,777	2,847
	<b>Total Miles</b>	3,255	3,257	3,464	3,564	3,370	3,227	3,233	3,214	3,295	3,289	3,371
	<b>Revenue Hours</b>	168	169	184	182	174	167	167	166	170	170	174
	<b>Total Hours</b>	217	214	228	227	218	207	207	206	211	210	216
	<b>Passengers</b>	445	454	478	491	495	475	483	481	493	492	504
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>	98	98	98	98	98	98	95	95	95	95	95
<b>Key Stats</b>	<b>Passengers per Hour</b>	2.6	2.7	2.6	2.7	2.8	2.8	2.9	2.9	2.9	2.9	2.9



**Traditional Fixed Route**

Motor Bus Directly Operated (MBDO) Excludes sbX (in Thousands except vehicles and ratios)		Actuals				Estimated	Projection					
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020
<b>Financial</b>	<b>Fare Revenue</b>	\$ 13,137	\$ 13,461	\$ 13,249	\$ 13,031	\$ 13,121	\$ 14,324	\$ 14,691	\$ 15,445	\$ 15,770	\$ 16,530	\$ 16,821
<b>Operating Data</b>	<b>Revenue Miles</b>	8,274	7,650	7,550	7,491	7,485	7,526	7,556	7,541	7,541	7,541	7,548
	<b>Total Miles</b>	8,901	8,236	8,137	8,074	8,068	8,081	8,113	8,097	8,097	8,097	8,105
	<b>Revenue Hours</b>	638	593	585	587	586	586	589	588	588	588	588
	<b>Total Hours</b>	667	619	612	613	612	611	614	613	613	613	613
	<b>Passengers</b>	14,307	14,320	15,523	15,510	15,055	14,324	14,403	13,915	13,956	13,549	13,565
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>	139	131	136	136	136	131	131	131	131	131	131
<b>Key Stats</b>	<b>Passengers per Hour</b>	22.4	24.2	26.5	26.4	25.7	24.4	24.4	23.7	23.7	23.1	23.1

**sbX**

Bus Rapid Transit (BRT) sbX (Not included in MBDO or MBPT)		Actuals				Estimated	Projection					
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020
<b>Financial</b>	<b>Fare Revenue</b>					\$ -	\$ 1,221	\$ 1,226	\$ 1,306	\$ 1,381	\$ 1,417	\$ 1,542
<b>Operating Data</b>	<b>Revenue Miles</b>					92	553	555	553	553	553	553
	<b>Total Miles</b>					97	570	572	570	570	570	570
	<b>Revenue Hours</b>					5	31	31	31	31	31	31
	<b>Total Hours</b>					6	32	33	32	32	32	32
	<b>Passengers</b>					233	1,454	1,460	1,403	1,446	1,355	1,429
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>					11	11	11	11	11	11	11
<b>Key Stats</b>	<b>Passengers per Hour</b>					45.7	51.9	47.4	45.7	47.1	44.1	46.6

**OmniGo and Contracted Weekend Fixed Route**

Motor Bus Purchased Transportation (MBPT) (in Thousands except vehicles and ratios)		Actuals				Estimated	Projection					
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020
<b>Financial</b>	<b>Fare Revenue</b>		\$ 69	\$ 110	\$ 122	\$ 139	\$ 151	\$ 155	\$ 164	\$ 167	\$ 176	\$ 179
<b>Operating Data</b>	<b>Revenue Miles</b>		279	360	370	368	370	371	370	371	370	371
	<b>Total Miles</b>		324	417	434	432	433	434	433	434	433	434
	<b>Revenue Hours</b>		22	27	28	28	28	28	28	28	28	28
	<b>Total Hours</b>		24	29	30	30	30	30	30	30	30	30
	<b>Passengers</b>		117	150	145	168	160	161	156	156	152	152
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>		7	7	7	7	7	7	7	7	7	7
<b>Key Stats</b>	<b>Passengers per Hour</b>		5.3	5.5	5.2	6.1	5.7	5.7	5.5	5.5	5.4	5.4

Attachment: City of Chino Appeal Request Form and Supporting Documentation (Appeal of the Draft

**Access**

Access (in Thousands except vehicles and ratios)		Actuals				Estimated	Projection					
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020
Financial	Fare Revenue	\$ 1,298	\$ 1,473	\$ 1,532	\$ 1,551	\$ 1,566	\$ 1,717	\$ 1,769	\$ 1,860	\$ 1,931	\$ 2,051	\$ 2,132
Operating Data	Revenue Miles	2,376	2,568	2,845	2,918	2,755	2,710	2,730	2,714	2,782	2,777	2,847
	Total Miles	3,011	3,119	3,346	3,456	3,263	3,209	3,233	3,214	3,295	3,289	3,371
	Revenue Hours	154	160	177	176	168	165	167	166	170	170	174
	Total Hours	197	202	218	218	209	205	207	206	211	210	216
	Passengers	399	431	459	473	477	472	483	481	493	492	504
Fleet Data	Peak Revenue Fleet	90	95	95	95	95	95	95	95	95	95	95
Key Stats	Passengers per Hour	2.6	2.7	2.6	2.7	2.8	2.85	2.9	2.9	2.9	2.9	2.9

**OmniLink Yucaipa**

OmniLink-Yucaipa (in Thousands except vehicles and ratios)		Actuals				Estimated	Projection					
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020
Financial	Fare Revenue	\$ 66	\$ 37	\$ 28	\$ 25	\$ 22	\$ 4	\$ -	\$ -	\$ -	\$ -	\$ -
Operating Data	Revenue Miles	109	67	62	57	53	9	-	-	-	-	-
	Total Miles	166	91	76	70	65	11	-	-	-	-	-
	Revenue Hours	10	5	4	4	4	1	-	-	-	-	-
	Total Hours	13	7	6	6	6	1	-	-	-	-	-
	Passengers	33	18	14	14	13	2	-	-	-	-	-
Fleet Data	Peak Revenue Fleet	5	2	2	2	2	2	-	-	-	-	-
Key Stats	Passengers per Hour	3.3	3.3	3.2	3.1	3.2	3.2	-	-	-	-	-

**OmniLink Chino Hills**

OmniLink-Chino Hills		Actuals				Estimated	Projection					
		FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020
Financial	Fare Revenue	\$ 25	\$ 13	\$ 11	\$ 9	\$ 10	\$ 2	\$ -	\$ -	\$ -	\$ -	\$ -
Operating Data	Revenue Miles	51	34	34	30	34	6	-	-	-	-	-
	Total Miles	77	47	42	38	43	7	-	-	-	-	-
	Revenue Hours	5	3	2	2	2	0	-	-	-	-	-
	Total Hours	7	4	3	3	3	1	-	-	-	-	-
	Passengers	13	6	5	5	5	1	-	-	-	-	-
Fleet Data	Peak Revenue Fleet	3	1	1	1	1	1	-	-	-	-	-
Key Stats	Passengers per Hour	2.6	2.2	2.1	2.2	2.2	2.2	-	-	-	-	-

## 12 FARE POLICY

Omnitrans’ Fare Policy sets the fare (price) for all services that Omnitrans offers. This includes any discounts for prepaid passes (i.e., daily, weekly, monthly), or bulk purchases and the parameters for other fare offerings such as Go Smart.

Omnitrans’ fare policy is set by the Board of Directors through approval of this SRTP. Each actual fare change is approved and implemented following the approval of each year’s Annual Management Plan.

Fare policies at Omnitrans and all transit agencies are designed based on an understanding of the tradeoffs inherent in setting fares. These tradeoffs require a balance between the desire to increase ridership, increase fare revenue, and increase service offerings, while keeping the fare reasonable for the rider and keeping the public subsidy reasonable for tax payers.

Another key tradeoff is between the frequency and size of successive fare changes. Omnitrans’ experience is that a fare increase of every three to four years, based on financial needs, balances this tradeoff best.

More frequent changes can be smaller, but leave riders with the perception of being nicked and dimed with increases. Too frequent increases also have each increase occurring before ridership levels recovered from previous increases. This can lead to a plateau or decline in ridership.

Conversely, infrequent but large fare increases cause some financial instability for the agency and leave riders with a sense of shock at each increase.

### 12.1 Fare Policy Requirements

Omnitrans must comply with federal, state, and local regulations when setting and changing fares. Five of these criteria drive Omnitrans’ fare policy:

- ▶ **Farebox Recovery Ratio:** California’s Transportation Development Act (TDA) requires that transit fares and local fare subsidies cover a minimum of twenty percent (20%) of operating costs for general public fixed-route service and cover ten percent (10%) of operating costs for ADA paratransit services.
- ▶ **Half Fare:** In order to receive FTA §5307 formula funding, a transit agency must provide seniors, disabled persons and Medicare recipients with an off-peak fare that is no greater than half of the full fare during the peak period. Given Omnitrans’ flat fare structure by time of day, this means that the senior/disability/Medicare fare must be no more than 50% of the full fare. {49 CFR § 5307(d)(1)(D)}
- ▶ **Access Fares:** The maximum fare for ADA complementary paratransit service (Access) is two times the regular base fare on general public fixed route service. {49 CFR § 37.131 (c)}
- ▶ **Fare Equity:** Title VI of the Civil Rights Act of 1964 requires that when transit agencies

change fares, the change does not place a disproportionate impact on low income or minority individuals without ensuring that any disparate impact is mitigated. Fare change must be evaluated in a fare equity analysis while being planned and prior to being approved.

- ▶ **Measure I:** Senior and disabled riders’ fares on fixed route and paratransit are offset by a Measure I-funded fare subsidy. This subsidy has a two-fold purpose: 1) help fund the half fare and two-times fare mandates discussed previously; and, 2) provide fare relief to the senior and disabled populations. Currently Measure I provides a \$0.05 or \$0.10 subsidy depending on the exact fixed route fare. On Access, Measure I provides a \$0.25 fare subsidy. The exact amount of the fare subsidy can be changed through agreement between SANBAG and Omnitrans; however, any increase in fare subsidy would be funded by a decrease in other Measure I operating funding.

### 12.2 Fare Goals

Setting fares is a crucial component of establishing an agency’s place in the market.

While ridership levels are determined primarily by the demographic, land use and density traits of a community, these are outside of a transit agency’s control. Fares, along with the quality and time competitiveness of the service offered, are a key element within an agency’s control that can influence overall ridership levels.

Increasing ridership and increasing fare revenue through appropriate fare choices are counterbalancing goals. An increase in fare will generally reduce ridership and increase fare revenue simultaneously because ridership does not typically fall by as much as the fare increases (transit fares are own-price inelastic).

The stated OmniConnects goal related to fares is:

- ▶ Maximize cost recovery while charging a fair fare.

This goal was essentially developed into a broader set of goals in previous SRTPs. Omnitrans' existing fare revenue goals consist of the following:

- ▶ Build ridership while maximizing revenue.
- ▶ Price fares so that passengers pay a reasonable amount and Omnitrans achieves system-wide farebox recovery targets.
- ▶ Maintain ease of understanding, ease of use, enforcement, and customer convenience of the fare structure and ensure fare media are recognizable and durable.
- ▶ Provide fare media options that meet rider needs.
- ▶ Promote regional integration.
- ▶ Minimize boarding times through fare technology and media options.
- ▶ Provide for regular fare structure reviews and adjustments.

These goals continue to be appropriate within the context of OmniConnects, and provide specific guidance in determining the fare policy for the FY2015-2020.

The financial plan that resulted from the conclusion of the Comprehensive Operational Assessment (COA) of Omnitrans had specific fare revenue targets. Fare revenue was projected to grow from \$14.8 million in FY2014 to \$19.2 million in FY2020. Hitting these targets requires a minimum 16.7% fare increase in FY2015 and a 14.3% fare increase in FY2018 in addition to the revenue generated by the launch of sbX.

Based on the remaining goals, the proposed fares strive to reach fare revenue and farebox recovery goals while also selecting levels that are easy to use, easy to remember and allow the easiest transactions possible with exact change.

### 12.3 Fare Analysis

In the COA financial plan, the base fare was proposed to increase from \$1.50 today to \$1.75 in FY2015 and \$2.00 in FY2018 in order to meet the plan's fare revenue goals.

In the previous FY2008-2013 SRTP, Omnitrans was expected to reach the \$1.75 base fare in FY2011 and the \$2.00 base fare threshold in FY2012. These fare increases were delayed as the economy recovered from a recession marked by persistently high unemployment rates.

These base fares were compared to peers both locally and nationally. In each case, Omnitrans' current fares are below the peer group averages for 2013. Locally, base fares ranged from \$1.25 at

Foothill Transit to \$2.00 at OCTA with a 2013 average of \$1.69. Given an increase to \$1.75 proposed for FY2015, Omnitrans' base fare remains comparable to peers. Nationally, peers' base fares ranged from \$1.00 to \$2.50, with a \$1.75 average.

The proposed senior/disability/Medicare cash fares are proposed based on the half-fare regulation and in light of the Measure I fare subsidy.

The Youth Fare has historically been discounted 25% compared to standard fixed-route fares. This generally matches slightly lower pass usage trends by youth compared to full fare riders.

With base fare and fare category discounts determined, the next crucial element are determining fare multiples. A fare multiple is the number of trips a rider needs to take before the next fare category becomes the lower priced fare.

Omnitrans' existing fare multiples have been successful in encouraging riders to use prepaid passes instead of cash at the farebox in higher rates than many peers. Since cash payments slow down boarding, the existing fare multiples were generally left in place and validated compared to ridership patterns.

### 12.4 Fixed Route Fares

Exhibit 147 describes Omnitrans' proposed fixed route fare structure through FY2020. Fare increases are proposed for September 2014 (FY2015), September 2016 (FY2017) and September 2018 (FY2019). Other than the specific fares, no fare policy was changed.

**Exhibit 147 Proposed Fixed Route Fare Structure**

	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020
<b>Cash/Ticket Fares</b>								
Full-Fare	\$1.50	\$1.50	\$1.75	\$1.75	\$2.00	\$2.00	\$2.25	\$2.00
Senior/Disability/Medicare	\$0.60	\$0.60	\$0.75	\$0.75	\$0.90	\$0.90	\$1.00	\$1.00
<b>Day Passes (Single)</b>								
Full-Fare	\$4.00	\$4.00	\$5.00	\$5.00	\$6.00	\$6.00	\$6.75	\$6.75
Senior/Disability/Medicare	\$1.85	\$1.85	\$2.25	\$2.25	\$2.25	\$2.75	\$3.00	\$3.00
<b>Day Passes (10-Pack)</b>								
Full-Fare	\$36.00	\$36.00	\$45.00	\$45.00	\$54.00	\$54.00	\$60.75	\$60.75
Senior/Disability/Medicare	\$15.50	\$15.50	\$20.00	\$20.00	\$24.75	\$24.75	\$27.00	\$27.00
<b>7-Day Passes</b>								
Full-Fare	\$15.00	\$15.00	\$18.00	\$18.00	\$20.00	\$20.00	\$23.00	\$23.00
Senior/Disability/Medicare	\$7.00	\$7.00	\$8.00	\$8.00	\$9.00	\$9.00	\$11.00	\$11.00
Youth	\$11.00	\$11.00	\$14.00	\$14.00	\$15.00	\$15.00	\$17.00	\$17.00
<b>31-Day Passes</b>								
Full-Fare	\$47.00	\$47.00	\$55.00	\$55.00	\$60.00	\$60.00	\$69.00	\$69.00
Senior/Disability/Medicare	\$23.50	\$23.50	\$27.50	\$27.50	\$30.00	\$30.00	\$34.50	\$34.50
Youth	\$35.00	\$35.00	\$41.00	\$41.00	\$45.00	\$45.00	\$52.00	\$52.00
<b>Go Smart</b>								
Go Smart	The Go Smart fare is a pre-negotiated fare for all riders that attend a partner university, college, trade/technical school, or high school, or work at a partner employer. Participants must have an active, valid Omnitrans-compatible ID card as proof of fare.							
<b>Free Fares</b>								
Children	Height < 46"; limit 2 free per fare-paying rider.							
Personal Care Attendant	Accompanying an ADA Rider.							
Transit Agency Employees	Omnitrans and RTA Employees and family with Employee/Family ID; OCTA, LA Metro and Foothill Transit Employees with Employee ID.							
Promotional Fares	Free or reduced fares for promotional efforts may be authorized by the Director of Marketing, the CEO/General Manager or the Board of Directors in accordance with their purchasing authority levels. Promotional fares shall be made available on a limited time basis only. Free or reduced fares cannot be provided for ongoing use by any group or organization as this would circumvent the fare policy. Special event free-ride vouchers for community organizations shall be limited to no more than two events per year.							
<b>Regional Transfers</b>								
OmniLink Transfer	Free with a valid transfer.							
MetroLink Transfer	Free to rider; SCRRA pays one base fare for two boardings with a MetroLink ticket/pass. A one-way MetroLink ticket can be used leaving a MetroLink station. A round trip MetroLink ticket or pass may be used to/from a MetroLink station.							
RTA Transfer	Omnitrans accepts valid RTA passes as a one-ride transfer at a point of contact. RTA reciprocates for local service and a \$1.50 charge for CommuterLink.							
Foothill Transit Transfer	Omnitrans accepts current valid Foothill Transit Passes as a one-ride transfer at a point of contact. Foothill Transit reciprocates.							
OCTA Transfer	Omnitrans accepts current valid OCTA Passes as a one ride transfer at a point of contact, currently only the Chino Transit Center. OCTA reciprocates.							
<b>Measure I Subsidy</b>								
On Board S&D	\$0.10 per boarding							
Outlet S&D	\$0.05 per boarding							
<b>Average Fare</b>	\$0.84	\$0.86	\$1.00	\$1.02	\$1.11	\$1.13	\$1.22	\$1.24

Attachment: City of Chino Appeal Request Form and Supporting Documentation (Appeal of the Draft

Fixed route fares apply to sbX Bus Rapid Transit, Local, Express and OmniGo Routes. Omnitrans has proposed keeping fixed-route fares consistent amongst classes of fixed-route service in order to maintain fare simplicity for the rider.

Omnitrans has surveyed 390 express bus riders on Route 215 and found that the slightly more than half have expressed a willingness to pay between \$0.25 and \$0.50 more per trip for additional express bus service due to the higher speed of travel and additional amenities on express services.<sup>1</sup>

Omnitrans currently has just one express route and one sbX bus rapid transit route. Providing an additional fare structure for one additional route in each case would be confusing to the rider and offer only a limited financial return. Thus, Omnitrans may consider different fare structures for express bus and sbX service when additional Express routes or sbX lines are in service.

For fixed route fares, the fare categories are defined as follows:

- ▶ **Senior:** 62 years of age and older that can be proven with a birth certificate, driver's license, D.M.V. ID card or a social security Medicare card.
- ▶ **Disability/Medicare:** Individuals can qualify if they can present: a C.A letter confirming 50% disability, D.M.V. Disability Placard receipt, Social Security insurance award letter, Omnitrans physician statement form, or Medicare card.
- ▶ **Youth:** An individual 18 years of age or younger who is not already covered by the children free fare. D.M.V. ID or high school ID may be required.

For senior/disability/Medicare fares, Omnitrans offers specific ID Cards rather than requiring this

information at the time of boarding.

## 12.5 OmniLink Fares

Exhibit 148 provides the proposed fare structure for OmniLink service through FY2020.

OmniLink fares are based on the same rules as fixed-route fares. The OmniLink base fare is two times the fixed route base fare. The youth and senior discounts apply as in fixed route service.

In addition to cash fare, Omnitrans riders have an opportunity to buy books of tickets. Each book of 10 tickets are sold for the price of 9 tickets in order to offer an incentive to pre-purchase. This matches the discount schedule in place today.

Other than the fare increases scheduled for September 2014 (FY2015), September 2016 (FY2017) and September 2018 (FY2019), all OmniLink fare policies remain in place.

**Exhibit 148: Proposed OmniLink Fare Structure**

	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020
<b>Cash Fares</b>								
Full-Fare	\$3.00	\$3.00	\$3.50	\$3.50	\$4.00	\$4.00	\$4.50	\$4.50
Senior/Disability/Medicare	\$1.50	\$1.50	\$1.75	\$1.75	\$2.00	\$2.00	\$2.25	\$2.25
Youth	\$2.00	\$2.00	\$2.50	\$2.50	\$3.00	\$3.00	\$3.50	\$3.50
<b>10-Ticket Books</b>								
Full-Fare	\$27.00	\$27.00	\$31.50	\$31.50	\$36.00	\$36.00	\$40.50	\$40.50
Senior/Disability/Medicare	\$13.50	\$13.50	\$15.75	\$15.75	\$18.00	\$18.00	\$20.25	\$20.25
Youth	\$18.00	\$18.00	\$22.50	\$22.50	\$27.00	\$27.00	\$31.50	\$31.50
<b>Free Fares</b>								
Children	Height < 46"; limit 2 per fare-paying rider.							
Personal Care Attendant	Accompanying an ADA-eligible Rider.							
<b>Average Fare</b>	\$1.80	\$1.80	\$2.03	\$2.13	\$2.40	\$2.33	\$2.63	\$2.70

<sup>1</sup> Route 215 Rider Survey, December 2012.

**12.6 Access Fares**

Access is the complementary paratransit service required by the Americans with Disability Act (ADA). As described in Section 12.1 Fare Policy Requirements, Access fares are governed by a mandate that fares cannot exceed two times the base fare for fixed route service.

Exhibit 149 shows Omnitrans’ proposed Access fares through FY2020. There are no changes to policy, other than the proposed fare increases scheduled for September 2014 (FY2015), September 2016 (FY2017) and September 2018 (FY2019). These changes are designed to remain consistent with the two times base fare requirement minus the \$0.25 fare subsidy provided by Measure I.

Access riders must have met ADA eligibility requirements prior to riding.

The Access fare covers the ADA-eligible rider, and each Access rider may transport up to two children at no additional cost. An ADA-qualified Access rider may have a Personal Care Attendant

(PCA) accompany them at no charge. If space permits, a qualified Access rider may bring companions along; however, the companions are required to pay full Access fare.

Access fares are based on the number of zones traveled. The base fare for access covers 1-3 Zones, which is a distance comparable to the longest routes in Omnitrans’ fixed route network.

The Access zone map is shown in Exhibit 150. The OmniConnects plan proposes a slight shift to the west of the zone boundaries by approximately one major street to accommodate FTA regulations and proposed changes in fixed route service.

Traditional Access service is provided within a ¾-mile area around each Omnitrans fixed route. If a resident lives within one of the JPA member cities but outside of the 3/4-mile boundary of an existing route, the individual is eligible for Beyond the Boundary Service if they agree to pay the “Beyond the Boundary” fee of \$5.00 in addition to the regular Access fares.

**12.7 Ridership Impact**

When bus fares increase, the expected result is a reduction in ridership, assuming all else remain constant. Based on Omnitrans’ experience and the *Transit Cooperative Research Program (TCRP Report 95, Chapter 12: Transit Pricing and Fares* Omnitrans can expect a mid-point arc elasticity of 0.36 for a typical fare increase. This implies that a normal 10% fare increase will cause a 3.6% reduction in ridership.

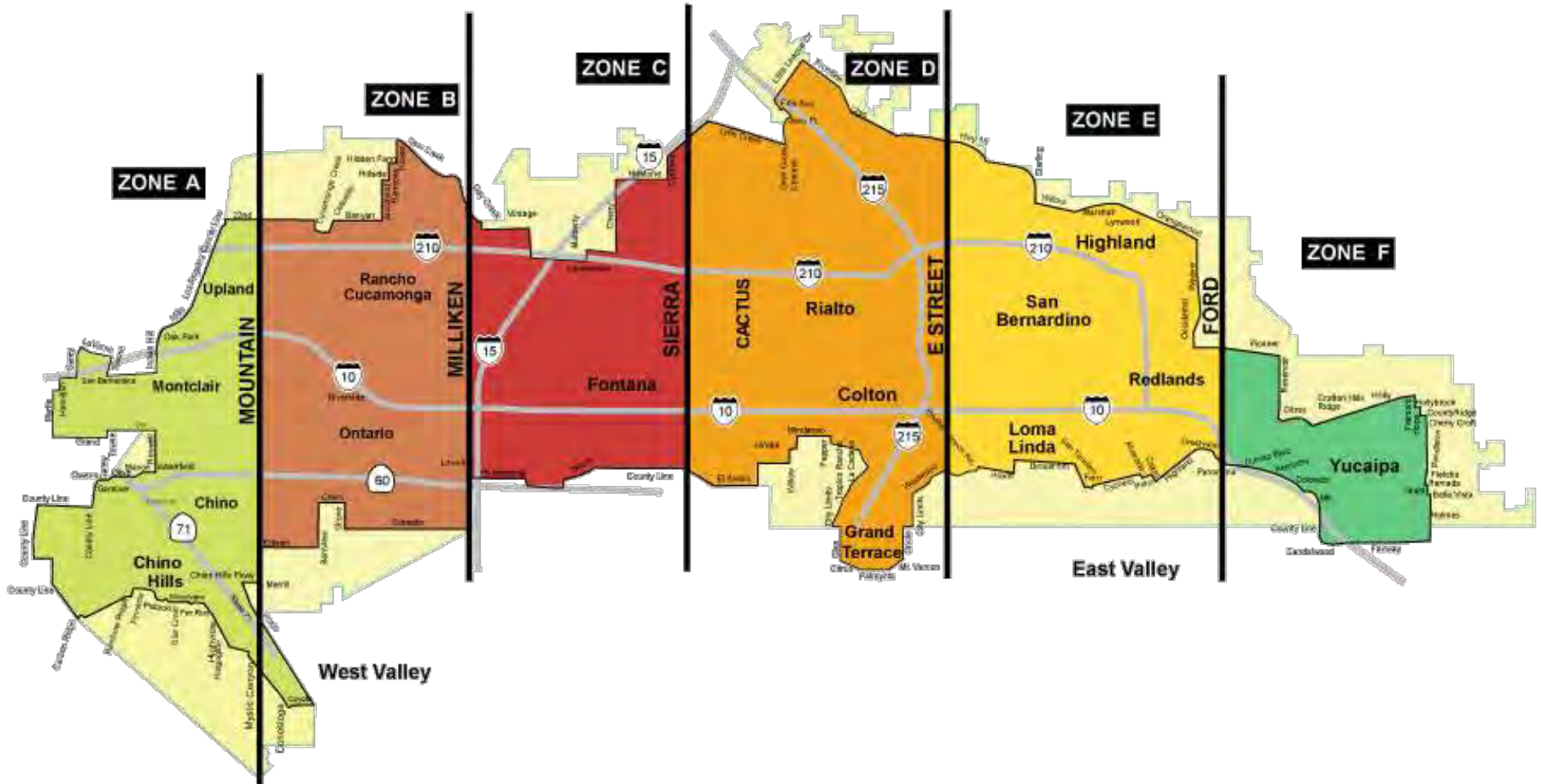
Based on the sizes of the fare increases proposed Omnitrans would expect to see a decline in ridership of 6.0% in FY2015, 5.2% in FY2017 and a 4.5% decline in FY2019, based on the 16.7%, 14.3%, and 12.5% fare increases, respectively. This is equivalent to 961,000 riders in FY2015, 800,000 riders in FY2017 and 750,000 riders in FY2019.

Typically, this reduction in ridership lasts for a minimum of one year before the public adjusts to the new fare; typically ridership levels begin to rise again return to previous levels within two to three years. Additionally, the expected growth of sb) and service modifications may offset some of this expected ridership decline.

**Exhibit 149: Proposed Access Fare Structure**

	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020
<b>Access Fares</b>								
1-3 Zone Cash/Ticket	\$2.75	\$2.75	\$3.25	\$3.25	\$3.75	\$3.75	\$4.25	\$4.25
Each Additional Zone	\$1.00	\$1.00	\$1.00	\$1.00	\$1.00	\$1.00	\$1.00	\$1.00
Beyond the Boundary additional fee	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00
<b>Free Fares</b>								
Personal Care Attendants	Accompanying an ADA Rider.							
Children	Height < 46”; limit 2 per fare paying riders.							
<b>Measure I Fare Subsidy</b>								
Fare Subsidy	\$0.25 per boarding							
<b>Average Fare</b>	\$3.28	\$3.28	\$3.64	\$3.66	\$3.87	\$3.92	\$4.17	\$4.25

Exhibit 150: Access Zone Map





## 13 TITLE VI FARE AND SERVICE EQUITY ANALYSES

As a recipient of federal funding under the Federal Transit Administration’s (FTA’s) guidelines, Omnitrans is required to report at least triennially on compliance with Title VI requirements. These requirements are outlined in the FTA Circular FTA C 4702.1B, dated October 1, 2012. These requirements are set forth in Section 601 of Title VI of the Civil Rights Act of 1964, which states that no person will be discriminated against, excluded from, or denied service based on race, color, or national origin.

To remain in compliance with the Civil Rights Act, each transit agency must report on the services it provides in relation to the population in its service area. In this way, it may be demonstrated that no group or groups are being denied service based on discriminatory planning.

Omnitrans is also required to conduct a Title VI analysis during the planning process for every major fare or service change before it occurs. By including these Fare and Service Equity Analyses in the Short Range Transit Plan, Omnitrans is demonstrating compliance in that the evaluations were completed as a component of the planning process.

### 13.1 Fare Equity Analysis

Omnitrans’ proposed Fare Policy is detailed in Chapter 13. As a Short-Range Transit Plan, OmniConnects must deliver a proposal with a balanced budget using expected available revenue sources compared to forecasted costs. In order to develop a balanced budget and meet California’s Transportation Development Act (TDA) mandated

farebox recovery ratios, Omnitrans proposes three fare increases between FY2015 and FY2020.

#### 13.1.1 Background

The Fare Equity Analysis does not address whether or not the agency can increase fares, but whether or not the agency does so in a fair and equitable manner. The analysis verifies that the proposed fare changes do not unfairly impact minority ridership, either by disparate treatment (intentional action) or by disparate impact (unintentional consequence). By offering alternate fare payment forms, Omnitrans gives its riders options whereby costs can be reduced and the effects of fare increases can be mitigated.

Omnitrans has not had a fare increase since September 2009 (FY2010). Since then, Omnitrans’ peer agencies have increased their fares, while Omnitrans has added additional service (OmniGo and sbX), added real-time bus arrival information in NexTrip, undergone rebranding (which included a refreshing of at-station amenities) and made many other improvements.

As Omnitrans must present a balanced budget, OmniConnects’ plan includes three across-the-board fare increases: 16% increase in FY2015, 14% increase in FY2017, and 12% in FY2019.

The proposed fare increases are described in Exhibit 147, Exhibit 153, and Exhibit 152.

The proposed fares maintain Omnitrans’ current fare structure in terms of multiple discounts, and

the relative discounts are generally maintained for discounted fare groups.

Access fares are described in Exhibit 3. These fares are determined by a rule which states that ADA complementary paratransit fares cannot exceed two times the fixed route base fare. Omnitrans also proposes a change to the Access zone map to remain compliant with ADA regulations.

The three fare increases proposed over the next five fiscal years are necessary to close a projected budgetary shortfall.

Omnitrans is not currently fare-comparable with its peers; Omnitrans’ base fixed route fare is currently \$1.50; local peers are currently at an average of \$1.69 based on a comparison to 25 transit agencies in California, and national mid-sized bus operator peers are currently at an average of \$1.75. These proposed increases in fares will rectify a long period of delay in fare adjustment and bring us into the main with comparable fares.

**Exhibit 151 Proposed Fixed Route Fare Structure**

	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020
<b>Cash/Ticket Fares</b>								
Full-Fare	\$1.50	\$1.50	\$1.75	\$1.75	\$2.00	\$2.00	\$2.25	\$2.00
Senior/Disability/Medicare	\$0.60	\$0.60	\$0.75	\$0.75	\$0.90	\$0.90	\$1.00	\$1.00
<b>Day Passes (Single)</b>								
Full-Fare	\$4.00	\$4.00	\$5.00	\$5.00	\$6.00	\$6.00	\$6.75	\$6.75
Senior/Disability/Medicare	\$1.85	\$1.85	\$2.25	\$2.25	\$2.25	\$2.75	\$3.00	\$3.00
<b>Day Passes (10-Pack)</b>								
Full-Fare	\$36.00	\$36.00	\$45.00	\$45.00	\$54.00	\$54.00	\$60.75	\$60.75
Senior/Disability/Medicare	\$15.50	\$15.50	\$20.00	\$20.00	\$24.75	\$24.75	\$27.00	\$27.00
<b>7-Day Passes</b>								
Full-Fare	\$15.00	\$15.00	\$18.00	\$18.00	\$20.00	\$20.00	\$23.00	\$23.00
Senior/Disability/Medicare	\$7.00	\$7.00	\$8.00	\$8.00	\$9.00	\$9.00	\$11.00	\$11.00
Youth	\$11.00	\$11.00	\$14.00	\$14.00	\$15.00	\$15.00	\$17.00	\$17.00
<b>31-Day Passes</b>								
Full-Fare	\$47.00	\$47.00	\$55.00	\$55.00	\$60.00	\$60.00	\$69.00	\$69.00
Senior/Disability/Medicare	\$23.50	\$23.50	\$27.50	\$27.50	\$30.00	\$30.00	\$34.50	\$34.50
Youth	\$35.00	\$35.00	\$41.00	\$41.00	\$45.00	\$45.00	\$52.00	\$52.00
<b>Go Smart</b>								
Go Smart	The Go Smart fare is a pre-negotiated fare for all riders that attend a partner university, college, trade/technical school, or high school, or work at a partner employer. Participants must have an active, valid Omnitrans-compatible ID card as proof of fare.							
<b>Free Fares</b>								
Children	Height < 46"; limit 2 free per fare-paying rider.							
Personal Care Attendant	Accompanying an ADA Rider.							
Transit Agency Employees	Omnitrans and RTA Employees and family with Employee/Family ID; OCTA, LA Metro and Foothill Transit Employees with Employee ID.							
Promotional Fares	Free or reduced fares for promotional efforts may be authorized by the Director of Marketing, the CEO/General Manager or the Board of Directors in accordance with their purchasing authority levels. Promotional fares shall be made available on a limited time basis only. Free or reduced fares cannot be provided for ongoing use by any group or organization as this would circumvent the fare policy. Special event free-ride vouchers for community organizations shall be limited to no more than two events per year.							
<b>Regional Transfers</b>								
OmniliNK Transfer	Free with a valid transfer.							
Metrolink Transfer	Free to rider; SCRRRA pays one base fare for two boardings with a Metrolink ticket/pass. A one-way Metrolink ticket can be used leaving a Metrolink station. A round trip Metrolink ticket or pass may be used to/from a Metrolink station.							
RTA Transfer	Omnitrans accepts valid RTA passes as a one-ride transfer at a point of contact. RTA reciprocates for local service and a \$1.50 charge for CommuterLink.							
Foothill Transit Transfer	Omnitrans accepts current valid Foothill Transit Passes as a one-ride transfer at a point of contact. Foothill Transit reciprocates.							
OCTA Transfer	Omnitrans accepts current valid OCTA Passes as a one ride transfer at a point of contact, currently only the Chino Transit Center. OCTA reciprocates.							
<b>Measure I Subsidy</b>								
On Board S&D	\$0.10 per boarding							
Outlet S&D	\$0.05 per boarding							

**Exhibit 153: Proposed OmniLink Fare Structure**

	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020
<b>Cash Fares</b>								
Full-Fare	\$3.00	\$3.00	\$3.50	\$3.50	\$4.00	\$4.00	\$4.50	\$4.50
Senior/Disability/Medicare	\$1.50	\$1.50	\$1.75	\$1.75	\$2.00	\$2.00	\$2.25	\$2.25
Youth	\$2.00	\$2.00	\$2.50	\$2.50	\$3.00	\$3.00	\$3.50	\$3.50
<b>10-Ticket Books</b>								
Full-Fare	\$27.00	\$27.00	\$31.50	\$31.50	\$36.00	\$36.00	\$40.50	\$40.50
Senior/Disability/Medicare	\$13.50	\$13.50	\$15.75	\$15.75	\$18.00	\$18.00	\$20.25	\$20.25
Youth	\$18.00	\$18.00	\$22.50	\$22.50	\$27.00	\$27.00	\$31.50	\$31.50
<b>Free Fares</b>								
Children	Height < 46"; limit 2 per fare-paying rider.							
Personal Care Attendant	Accompanying an ADA-eligible Rider.							

**Exhibit 152: Proposed Access Fare Structure**

	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020
<b>Access Fares</b>								
1-3 Zone Cash/Ticket	\$2.75	\$2.75	\$3.25	\$3.25	\$3.75	\$3.75	\$4.25	\$4.25
Each Additional Zone	\$1.00	\$1.00	\$1.00	\$1.00	\$1.00	\$1.00	\$1.00	\$1.00
Beyond the Boundary additional fee	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00
<b>Free Fares</b>								
Personal Care Attendants	Accompanying an ADA Rider.							
Children	Height < 46"; limit 2 per fare paying riders.							
<b>Measure I Fare Subsidy</b>								
Fare Subsidy	\$0.25 per boarding							

**13.1.2 Analysis of Fare Type Use by Ethnicity**

Although across the board fare changes might appear at first glance to be intrinsically fair to all riders, increases may still unduly affect minorities due to how fare types might be differentially utilized by ethnicity.

In order to determine how fare types were used by minorities versus white riders, an onboard survey (OmniTrans’ Onboard Intercept Rider Survey) was performed by Redhill Group in 2011. The results of this survey’s analysis of fare type use by ethnicity are reported in Exhibit 154. In the final column (“Outcome”), those transactions which need to be analyzed further are identified, while those that do not are identified as “No Disparate Impact.” Note that in some of the tables results are reported as both proportion minority

and proportion Low-Income/ Minority (LIM). LIM is a necessary measure used in the Environmental Justice component of Title VI analyses, but is not used as part of Service or Fare Equity analyses; proportion minority is the salient measure used in all Title VI analyses. Both are reported in triennial Title VI reports. Although both measures are reported for the purpose of completeness wherever possible here, LIM data was not always available for all surveys and tables, and proportion minority is the only necessary measure.

**13.1.3 Analysis and Conclusion**

All fixed route fares are proposed to increase according to the schedule shown previously. However, not all increases are at exactly the same rate. In planning, it is a best practice to “spread out” the increase over the different fare types as

equitably as practicable, so as to minimize the effect on any single group of riders, and so that all riders can have the option to use more cost-effective fare options so as to save costs. Furthermore, the fares must be easy for making cash transactions: a \$0.75 fare, for example, is easier to collect than a \$0.65 or \$0.70 fare. So even though the average increase for FY2015, FY2017, and FY2019 will be sixteen percent, fourteen percent, and twelve percent, respectively, particular fare types will experience increases that are either greater or lesser than these averages. Note as well that although some fare increases may appear on the face of it to be more exorbitant, e.g., Senior / Disability Cash (One Way) fare (a 25% increase), in terms of actual cost, the fare will go up from \$0.60 to \$0.75, or only \$0.15—in all probability, a fare increase which

**Exhibit 154: Omnitrans' Onboard Intercept Rider Survey Results**

	MINORITY (vs Fare Type Total)	Caucasian/White (vs Fare Type Total)	TOTAL	FY2015 Fare Change	FY2017 Fare Change	FY2019 Fare Change	Outcome
<b>Cash/Ticket Fares</b>							
Full-Fare	23.4%	18.9%	22.5%	16.7%	14.3%	12.5%	Further Analysis Follows
Senior/Disability/Medicare	1.6%	3.7%	2.1%	25.0%	20.0%	11.1%	No Disparate Impact
<b>Day Passes (Single)</b>							
Full-Fare	21.2%	15.7%	20.0%	25.0%	20.0%	12.5%	Further Analysis Follows
Senior/Disability/Medicare	2.7%	6.4%	3.5%	21.6%	22.2%	9.1%	No Disparate Impact
<b>7-Day Passes</b>							
Full-Fare	6.2%	4.7%	5.9%	20.0%	11.1%	15.0%	Further Analysis Follows
Senior/Disability/Medicare	0.7%	1.5%	0.8%	14.3%	12.5%	22.2%	No Disparate Impact
Youth	3.4%	1.2%	2.9%	27.3%	7.1%	13.3%	Further Analysis Follows
<b>31-Day Passes</b>							
Full-Fare	19.1%	19.4%	19.2%	17.0%	9.1%	15.0%	No Disparate Impact
Senior/Disability/Medicare	5.9%	14.2%	7.7%	17.0%	9.1%	15.0%	No Disparate Impact
Youth	9.9%	9.6%	9.8%	17.1%	9.8%	15.6%	No Disparate Impact
Other	5.9%	4.7%	5.6%				
TOTAL	100.0%	100.0%	100.0%				

should be more readily absorbed.

The fare types are also not used equally by minority riders as compared to white riders, as can be seen in this exhibit. Since any fare increase which is used equally by minority riders and white riders will not demonstrate disparate impact, those increases will not need to be addressed as they are not discriminatory. However, those increases in fare types which do show difference in minority usage will need to be analyzed.

Firstly, the only fare types that show differential usage patterns by race are: Cash (Full Fare), Day Pass, Single (Full Fare), and 7-day Pass (Full Fare, and Youth). All other fare type categories show either white usage at higher rates, or no difference between minority and white usage, and therefore have no disparate impact.

Secondly, the proportionally highest fare increases are for day passes and for Seniors and Disabled (Sr/Dis). Day and One-Way (cash) fares go up 25% and 16.7%, respectively. Sr/Dis passes go up 25% (one-way, or cash) and 21.6% (Sr/Dis Day pass). 7-day Youth passes also go up (27.3%).

As is noted, many of the fares which are increased the most are not unduly discriminatory toward minorities. Sr/Dis One Way passes are bought by whites at a higher proportion than by minorities, and Sr/Dis Day Passes are also purchased at a higher proportion by whites than they are by minorities.

For the four fare types which show greater purchase on the part of

minorities over whites, further analysis is in order. In each of these situations, there are mitigating options provided for all riders. In all cases, riders are left the choice to select other forms of fare passes which are less expensive, and which give consumers cost-savings by ticket purchase in bulk in the form of multiple day passes (weekly, or 7-day passes, and monthly, or 31-day passes). There is one category of the four fare types requiring further analysis in which minorities purchase passes with increased fares at a much greater proportion than whites do, and that is for Student Weekly Passes (the Youth Pass). Those youths using multiple day passes are not restricted to one- or 7-day passes, though; they always have the option to purchase 31-day Youth passes, which increase their cost savings. Also, in this case, it has been shown by survey at Chaffey College that the greatest users of the Go Smart subsidized fare passes are minority students, so minority students have this option as well.

The Go Smart program functions, in effect, as a cost-saving alternative to increased fares for the Weekly Youth Pass, and as such mitigates the effect of such fare increases. According to survey data from Chaffey College's Office of Institutional Research, out of 4,683 students (20% of the student population at Chaffey College), those most likely to participate in the Go Smart program are

African American and first generation collegiate Hispanic students (29.3% of African American student population, and 27.0% of Hispanic student population, respectively). In short, although the Youth Pass fare increase will impact minorities more heavily than whites, the option exists in any case for students in schools which are part of the subsidized Go Smart program to use Go Smart which is a very effective cost-savings mechanism minority students can use to reduce the impact of Youth Pass cost fare increase. Further, this category still provides a reduced fare over full fare passes.

**13.1.4 OmniLink Service**

OmniLink is an alternative curb-to-curb dial-a-ride service which Omnitrans has offered over the years to two communities: Chino Hills and Yucaipa. This was done because the residential densities of the more rural portions of both communities did not support traditional fixed route transit service. It was felt at the time that a type of dial-a-ride service using smaller coaches on more narrow thoroughfares might better fulfill the communities' transit needs. Since then Omnitrans has added local OmniGo circulator services to these communities in the form of Routes 365 (Chino Hills) and Routes 308/309, and 310 (Yucaipa). Subsequently, these circulator routes have served and met the needs of the great

**Exhibit 155: Percentage of Minority Residents in Omnitrans' Service Area by City**

CITY	Total 2010 Population	Number "White, Non-Hispanic"	Percentage "White, Non-Hispanic"	Proportion (%) Minority	Number Minority
<b>SAN BERNARDINO COUNTY (2011)</b>	<b>2,035,210</b>	<b>677,598</b>	<b>33.3%</b>	<b>66.7%</b>	<b>1,357,612</b>
<b>Within one-half mile of any service</b>	<b>1,253,669</b>	<b>307,119</b>	<b>24.5%</b>	<b>75.5%</b>	<b>946,550</b>
<b>Chino Hills</b>	<b>75,000</b>	<b>25,050</b>	<b>33.4%</b>	<b>66.6%</b>	<b>49,950</b>
<b>Yucaipa</b>	<b>51,000</b>	<b>33,609</b>	<b>65.9%</b>	<b>34.1%</b>	<b>17,391</b>

majority of OmniLink riders, and now, due to OmniLink's very high cost for continued service, it is necessary either to increase OmniLink fares or eliminate OmniLink service. It is proposed that OmniLink service be discontinued to these two communities; in lieu of that, it is proposed that the fares for OmniLink be increased.

A view in Exhibit 155 of the population and ethnic demographics of these two communities compared to that of the county and Omnitrans' service area as a whole reveals that OmniLink fare changes do not adversely impact the minority community.

As can be seen, neither community possesses a minority proportion which is greater than that of the county or of Omnitrans' service area, as defined by the one-half mile buffer surrounding all fixed route service. The percentage of minority residents in San Bernardino County is 66.7%, and the percentage of minorities for our service area is 75.5%; at the same time, the proportion of minority residents for Chino Hills is 66.6%, and for Yucaipa is 34.1%. For this reason, Omnitrans'

actions in either increasing fares for or eliminating OmniLink service does not constitute disparate treatment or disparate impact towards minority riders.

To conclude, Omnitrans must increase fares over the next five years. This translates to three fare increases from FY2015 to FY2020. Although fares do increase across the board, survey analysis of our ridership shows that minority riders are not unfairly affected in terms of either disparate treatment or disparate impact.

### 13.2 Service Equity Analysis

Omnitrans has proposed a restructuring of some service within the OmniConnects FY2015-2020 Short Range Transit Plan. This follows a period of very limited to no change in its fixed route service since FY2010. Fundamentally, proposed changes to service follow these general trends:

- ▶ Straightening of north-south-oriented routes, especially in the West Valley, which have long been needed and requested by our riders;

- ▶ Consolidation and streamlining of service and connections between major trip generators by increasing more productivity-oriented routing, reducing duplicative service, and strengthening key east-west connections to the new sbX Green Line;
- ▶ Creating direct connections between Chaffey College and Fontana, and between Fontana and Yucaipa; and,
- ▶ Changing frequencies of a few routes based on historical performance compared to established standards in order to increase the overall productivity of Omnitrans' service.

A summary of the proposed major alterations is shown in Exhibit 156 and Exhibit 157 gives those routes which will undergo physical or alignment change primarily. Exhibit 157 shows those routes which will undergo frequency changes exclusively.

**Exhibit 156: Proposed Physical Route Changes**

<b>ROUTE</b>	<b>PROPOSED SERVICE CHANGE (Alignment)</b>	<b>EFFECT</b>
2	<b>CHANGES COINCIDE WITH sbX.</b>	<b>Equity Analysis already performed in 2013</b>
5	Change (straightening) of alignment to run along Waterman	Improve productivity and On-Time performance, decrease "meander"
7	<b>CHANGES COINCIDE WITH sbX.</b>	<b>Equity Analysis already performed in 2013</b>
8	Route proposed to be shortened, split into long (8 West) and short (8 East) portions	8 East (short) section will be 60 minutes; 8 West (long) will run at 30 minute frequency. Adds 2 buses weekdays.
9	Route proposed to be eliminated; portions of route will be picked up by a newly rebuilt Route 19 (which will include elements of 9 on Barton and 5 on Waterman).	Route Elimination; consolidated into Route 19; increased frequency of service on weekends.
19	Proposed to rebuild route as a longer route incorporating portions of routes 9 and 19, to extend from Fontana to Yucaipa and back.	Route to be rebuilt, lengthened, consolidate elements of routes 9 and 19. Will add 2 buses to weekday service.
22	Larger turnaround loop at southern EOL of route eliminated to reduce duplicated service.	Slight change in alignment to shorten EOL terminus to Arrowhead Regional Medical Center.
63	Route proposed to align more directly along Mountain, where there are more riders (in effect, covers a portion of Route 67)	Realignment along Mountain; adds 1 bus to service.
65	Numerous alignment changes and frequency changes; elimination of redundant service; better service along Central Avenue; aligns frequency better with ridership demand.	Adds 4 buses to weekday service; increases weekday frequency. Adds one bus each day on weekends. New alignment to make route more productive and efficient.
67	Proposed to shorten route to end at Chaffey College; alignment will have better EOL with higher ridership.	Saves 1 bus; no change in frequency, but shorter route spatially. Connects Fontana to Chaffey College with direct service.
68	Route realigned to better meet ridership needs; lower ridership-demand Ramona Avenue section now has lower but more appropriate frequency. Frequency reduced from 30 minutes to 60 minutes on weekdays, number of buses saved.	Saves 1 bus each on Saturdays and Sundays; saves five buses on weekdays; frequency reduced on weekdays.
80	Realignment on western portion of route removes redundant service from Holt westward, makes route more efficient. New end of line at Ontario Civic Center Transfer Station.	Realignment saves 1 bus weekdays.
81	Route will be realigned to incorporate elements of routes 81 and 82; route made less circuitous and more direct; efficiency increased, frequency not changed.	Change in length and alignment of route; no change in frequency or number of buses.
82	Route shortened and realigned from Commerce to Milliken; EOL expanded to turnaround serving Victoria Gardens directly (replaces route 81 there).	Route realigned; adds 1 bus on weekdays; no frequency changes.
83	Route realigned to reduce number of turns in southern part, is made straighter and more efficient, and better serves Chaffey College Chino campus.	Realignment, but no change in bus number or in frequency of service.
84	New weekday route proposed incorporating elements of the old Route 81 (which will not remain with that more streamlined alignment) and Route 63.	New route to cover what was shed from Routes 81 and 63; requires adding 2 buses on weekdays.

**Exhibit 157: Proposed Frequency Changes**

ROUTE	PROPOSED SERVICE CHANGE (Frequency)	EFFECT
3	Increase frequency from 15/20 minute to 15 minute service	Add 1 bus to service; Frequency increase
4	Increase frequency from 15/20 minute to 15 minute service	Add 1 bus to service; Frequency increase
20	Due to poorest performance of all fixed routes, proposed to reduce frequency from 30 minutes to 60 minutes.	Saves 1 bus and reduces frequency
215	Frequency increased for weekends from 60 minute to 30 minute service to meet rider demand.	Change in frequency on weekends adds one bus on Saturdays and Sundays.

**13.2.1 Title VI Compliance of Routes Prior to Proposed Changes**

Low-Income / Minority (LIM) and Minority proportions for populations associated with all routes were determined for each fixed route during the last Title VI update. This determination was done as part of the 2012 Title VI Triennial update, or shortly subsequent to that, as the route came into being, e.g., Route 310 in Yucaipa and the new sbX (both determined on or before 2013, the sbX route determined as part of the Service Equity analysis performed in the fall of 2013 and approved by the Board in January of 2014, six months prior to start of full revenue service). The determination was accomplished by analysis of the demographic character of the region(s) within the one-half mile pedestrian buffers surrounding each route. In doing so, the demographic character of each route was determined, and could be compared to that of the service area as a whole, and to what changes would be proposed to the individual routes in the future. Exhibit 158 shows both the minority and the LIM proportion of the population by route.

**13.2.2 Analysis of Route Demographics I: Lost Service**

The proposed changes to the fixed routes do not appreciably change the basic contours or expanse of the service area overall. Even though there is some consolidating of routes, there are very few areas that are overtly affected in the sense that they have entirely lost service. Exhibit 159 shows those regions of the service area where route lines no longer run along streets they had previously. There are a total of only six regions in Omnitrans' service area which have had a section of route removed, and they are numerically identified and circled in red. Of these six regions, two (Regions 5 and 6) are covered by at least one other fixed route at a one-half mile pedestrian distance, and so they do not lose service; the removal of a section of route in these cases does not constitute lost service. However, Regions 1 through 4 are not covered by at least one fixed route at a one-half mile pedestrian distance. As such, only those four areas need to be addressed in terms of lost service.

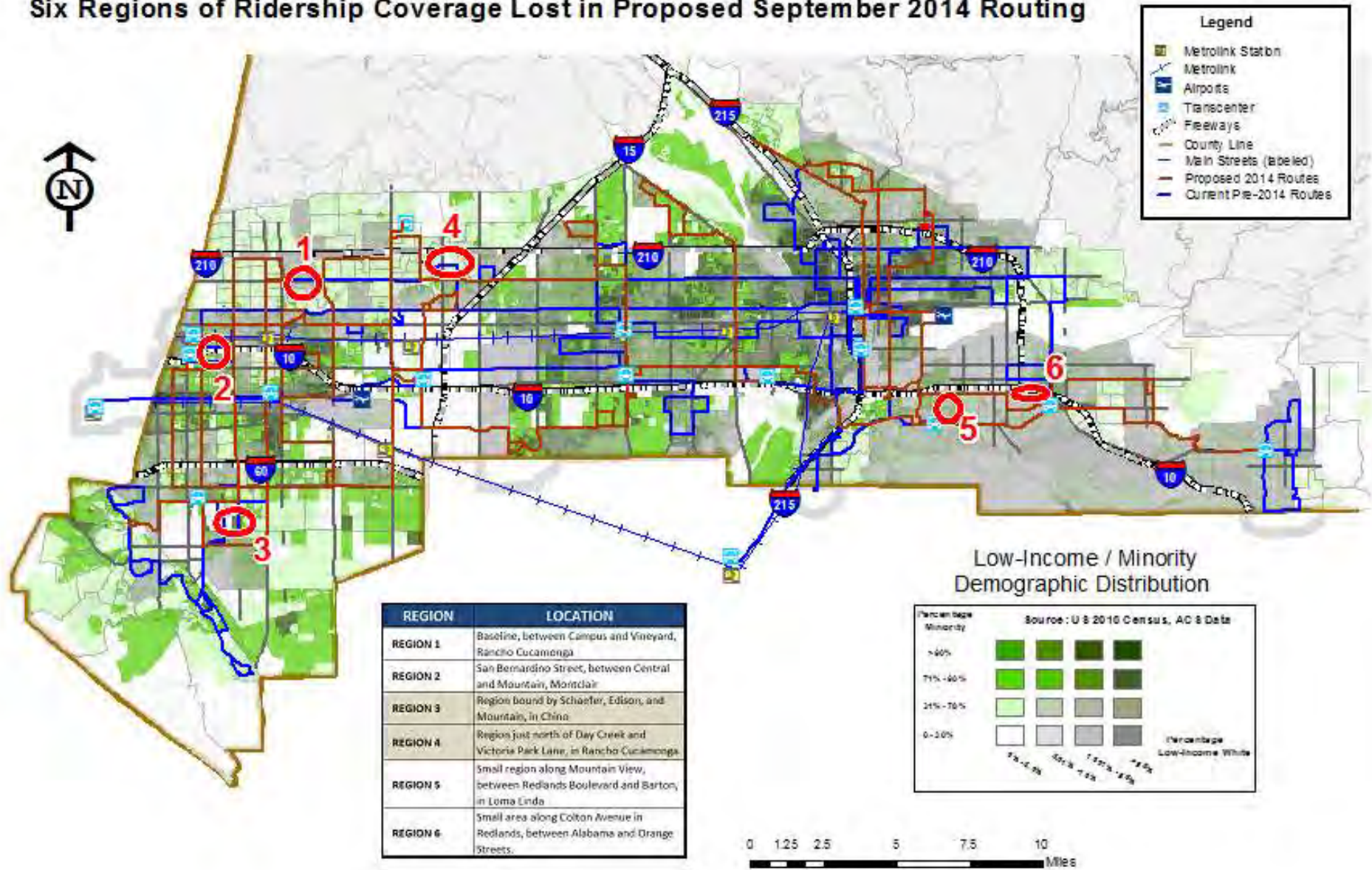
**Exhibit 158: Low-Income/Minority (LIM) Determination by Route**

Region:	% Minority	Percentage LIM
<b>Countywide</b>	<b>66.7%</b>	<b>70.0%</b>
<b>Omnitrans' Service Area</b>	<b>75.5%</b>	<b>77.6%</b>
1	86.7%	90.0%
2	77.4%	81.4%
3	83.7%	87.9%
4	83.7%	87.9%
5	79.7%	83.8%
7	76.1%	79.0%
8	63.7%	67.1%
9	58.2%	61.2%
10	90.9%	92.2%
11	88.6%	90.9%
14	89.8%	91.7%
15	82.4%	84.6%
19	80.7%	82.9%
20	90.5%	92.0%
22	86.3%	87.6%
29	84.8%	87.4%
61	88.2%	89.8%
63	80.1%	81.4%
65	78.8%	80.2%
66	72.7%	75.0%
67	66.7%	68.4%
68	72.4%	74.5%
80	72.1%	74.0%
81	73.2%	74.7%
82	84.0%	84.5%
83	73.6%	74.4%
215	82.0%	83.9%
308/309	37.6%	39.2%
310	35.0%	37.5%
325	64.2%	66.8%
365	71.9%	73.3%
sbX (Green Line)	76.1%	79.1%



Exhibit 159 : Regions with Service Reductions

### Six Regions of Ridership Coverage Lost in Proposed September 2014 Routing



In these cases, all but one falls below the threshold for Title VI. This would be Region 2, where the realignment of Route 80 affects Palo Verde Street in Montclair; in this case, the realignment away from Palo Verde is warranted because the new alignment seeks to eliminate redundancy from Holt Boulevard to the Montclair Transit Center (MTC) along a section of Route 80 which has never consistently met service standards for ridership or farebox recovery. Realignment offers a new and long-requested way to connect riders in Ontario with the important trip generator at Chaffey College. As the proportion of minorities within this region is

74.8%, and that within Omnitrans' service area is 75.5%, this realignment does not impose either disparate treatment or disparate impact.

Analysis in depth of the four identified regions follows.

**BASELINE SECTION** Baseline Between Campus and Vineyard

This section is found along a short stretch of Baseline between Campus on the west (served by Routes 63 and 83) and Vineyard / Carnelian on the east (served by Route 80—see the region in dashed yellow outline in Exhibit 161). This section will be lost due to the shortening of Route 67 and

Exhibit 161: Baseline between Campus & Vineyard



Exhibit 160: Analysis of Lost Sections within the 2014 Service Area

REGION	ROUTE SECTION LOST Within 1/2-Mile Pedestrian Buffer	Total Population	Total Whites (Tot Pop - Minorities)	Low Income Whites	Minorities	% Minorities	Total LIM	% LIW of LIM	% LIM
<b>COUNTYWIDE</b>		2,035,210	677,598	67,850	1,357,612	<b>66.7%</b>	1,425,462	4.8%	<b>70.0%</b>
<b>Omnitrans' Service Area (One-half Mile of Any Fixed Route Service)</b>		1,253,669	307,119	26,669	946,550	<b>75.5%</b>	973,219	2.7%	<b>77.6%</b>
1	<b>BASELINE SECTION, RANCHO CUCAMONGA</b>	5,231	2,877	248	2,354	<b>45.0%</b>	2,602	9.5%	<b>49.7%</b>
2	<b>PALO VERDE STREET, 7th STREET; MONTCLAIR</b>	4,695	1,183	202	3,512	<b>74.8%</b>	3,714	5.4%	<b>79.1%</b>
3	<b>SCHAEFER, EDISON, MOUNTAIN AREA, CHINO</b>	6,294	1,996	83	4,298	<b>68.3%</b>	4,381	1.9%	<b>69.6%</b>
4	<b>NORTH OF DAY CREEK AND VICTORIA PARK, RANCHO CUCAMONGA</b>	4,349	1,885	18	2,464	<b>56.7%</b>	2,482	0.7%	<b>57.1%</b>

other routes' realignment. However, the percentage of minorities living in this area is 45% which is well below the proportion for our service area (75.5%). This realignment does not impose disparate treatment or disparate impact.

► **BETWEEN PALO VERDE AND 7<sup>th</sup> STREETS**  
Section between Palo Verde/5<sup>th</sup> Street and 7<sup>th</sup> Street, Montclair.

Exhibit 162: Region between Palo Verde and 7<sup>th</sup> Streets



This section, which lies between Central on the West and Mountain on the East (see dashed yellow outline in Exhibit 162), is an area marked by the corner of Central Ave. and San Bernardino Street, and the half-mile pedestrian walking distance which extends north-easterly from this corner up to and just north of the I-10 Freeway. Service from the old Route 80 was realigned here.

Route 80 has not met standards for a significant period of time (ridership in terms of passengers per hour has not met standard for a year, and farebox recovery ratio for the route has not met

standard for two years). Realignment of this route seeks to improve route performance in order to meet these standards, and offers a new way to connect riders in Ontario with Chaffey College, which is something that riders have requested for a long time. As the proportion of minorities within this region is 74.8%, and that within Omnitrans' service area is 75.5%, this realignment does not impose either disparate treatment or disparate impact.

► **SCHAEFER, EDISON, and MOUNTAIN STREETS SECTION** Along a section of these three streets in Chino.

Exhibit 163: Schaefer, Edison, and Mountain Streets



This section is found in the interior region defined by the streets of Schaefer, Mountain, Edison, and Oaks, and bound outside of that by the half-mile pedestrian walking areas around the routes 63 and 83 (see dashed yellow outline in Exhibit 163). A roughly 1.25 x 0.5 mile (0.63 square mile) area in

this interior faces a service reduction with the new route alignments. This region is marked by 68.3% minority residents, which falls under the proportions for our service area overall of 75.5% minority. The new alignment does not impose disparate treatment or disparate impact.

► **NORTH OF DAY CREEK AND VICTORIA PARK RANCHO CUCAMONGA** A section bounded by Victoria Park (south) and the 210 Freeway (north).

Exhibit 164: Day Creek and Victoria Park



This area lies roughly south of the 210 freeway and north of Victoria Park Lane in Rancho Cucamonga, and before the realignment of Route 81, was part of that route's former half-mile pedestrian walking area which is no longer covered by the half-mile walking area associated with the new Route 67 (see dashed yellow outline in Exhibit 164). In this area, the percentage of

residents which are minorities is 56.7%; this is below that of our service area, which is 75.5% minority. This realignment does not impose disparate treatment or disparate impact.

### 13.2.3 Analysis of Route Demographics II: Frequency of Service Changes

OmniConnects realigns Routes 65 and 68 both in terms of route map and service frequency. The goal of the alignment is to match the highest performing parts of these partially parallel routes with the higher frequency service and the lower performing parts with the lower frequency service. In doing so the routes combined will perform better compared to standard and improve service for the slightly more minority populated region.

Route 68 will have service frequency reduced from 30-minute to 60-minute service along Ramona Avenue. The resources from Route 68 are transferred to Route 65 along the parallel Central Avenue, which will have its frequency increased to 30-minute service from 60-minute. For the stretch along Central Avenue there has been much higher ridership than along Ramona, and this is recognized by increasing frequency of service from 60-minutes to 30-minutes for this route. These

two stretches (Ramona and Central) do not have appreciably different demographic profiles in terms of minority or LIM residents. As well, their percentages of minority or LIM residents are greater than that for Omnitrans' service area as a whole, as shown in Exhibit 165. The only thing that changes is their frequencies of service, which are simply switched with each other's. This realignment and frequency change does not impose disparate treatment or disparate impact, as respective minority shares are essentially identical (see also Exhibit 172).

Four additional routes will have frequencies changed without accompanying realignment. Routes 3 and 4 (converses of each other—they are the same route run clockwise and counterclockwise) will have their frequencies increased. Route 3/4 minority share is 83.7% and its LIM share is 87.9%, both shares of which are greater than the same measures for either the County as a whole or Omnitrans' service area. The increase in service advantageously improves service offering for this predominantly LIM community.

Route 215 will have its weekend frequency

increased as well to meet increasing ridership demand on weekends. The improvement is proposed because the route has more than 40 passengers per hour and for a freeway express route is occasionally exceeding its load factor standard of 1.0. The routes' proportion of minority residents within one-half mile buffer is 82.0%, and its LIM proportion is 83.9%, both of which exceed what is found for both the County as a whole and for Omnitrans' service area; as a result, increasing service frequency is, in fact, a boon for the higher minority resident base served by this route.

The only one of the four routes whose frequency will be reduced from 30-minute to 60-minute service will be Route 20. This route's demographic profile (90.5% minority and 92% LIM) represents a greater percentage of both minority and LIM residents than that found overall in Omnitrans' service area. As such, this frequency change was carefully evaluated within the Title VI context.

The recommendation to reduce service on Route 20 is a direct result of years of low ridership. Route 20 is the poorest performing route in terms of passengers per hour of all 30-minute routes in Omnitrans' service area, and has been for a long

**Exhibit 165: Analysis of Areas with Frequency Changes within the 2014 Service Area**

REGION	ROUTE SECTION LOST Within 1/2-Mile Pedestrian Buffer	Total Population	Total Whites (Tot Pop - Minorities)	Low Income Whites	Minorities	% Minorities	Total LIM	% LIW of LIM	% LIM
<b>COUNTYWIDE</b>		2,035,210	677,598	67,850	1,357,612	<b>66.7%</b>	1,425,462	4.8%	<b>70.0%</b>
<b>Omnitrans' Service Area (One-half Mile of Any Fixed Route Service)</b>		1,253,669	307,119	26,669	946,550	<b>75.5%</b>	973,219	2.7%	<b>77.6%</b>
<b>ALONG RAMONA</b>		43,363	7,989	1,525	35,374	<b>81.58%</b>	36,899	4.13%	<b>85.09%</b>
<b>ALONG CENTRAL</b>		49,109	8,932	1,913	40,177	<b>81.81%</b>	42,090	4.55%	<b>85.71%</b>

time. The primary reason for this poor performance is the southern half of the route lies within the walking standard of Route 61, which is one of Omnitrans highest frequency and highest performing routes. Residents in the area are choosing to use Route 61, instead of waiting for the lower frequency Route 20. As a result, Omnitrans proposes to shift the resources from Route 20 to allow for the improvements to frequency on Route 3/4, which also serves a high LIM population but without as much service duplication.

With this said, the proposed change to Route 20 is not a route elimination as the riders will still be served. There is no disparate treatment as the same standards are applied to Route 20 as to other routes.

### 13.2.4 Analysis of Route Demographics III: New Service, Increased Frequency of Service

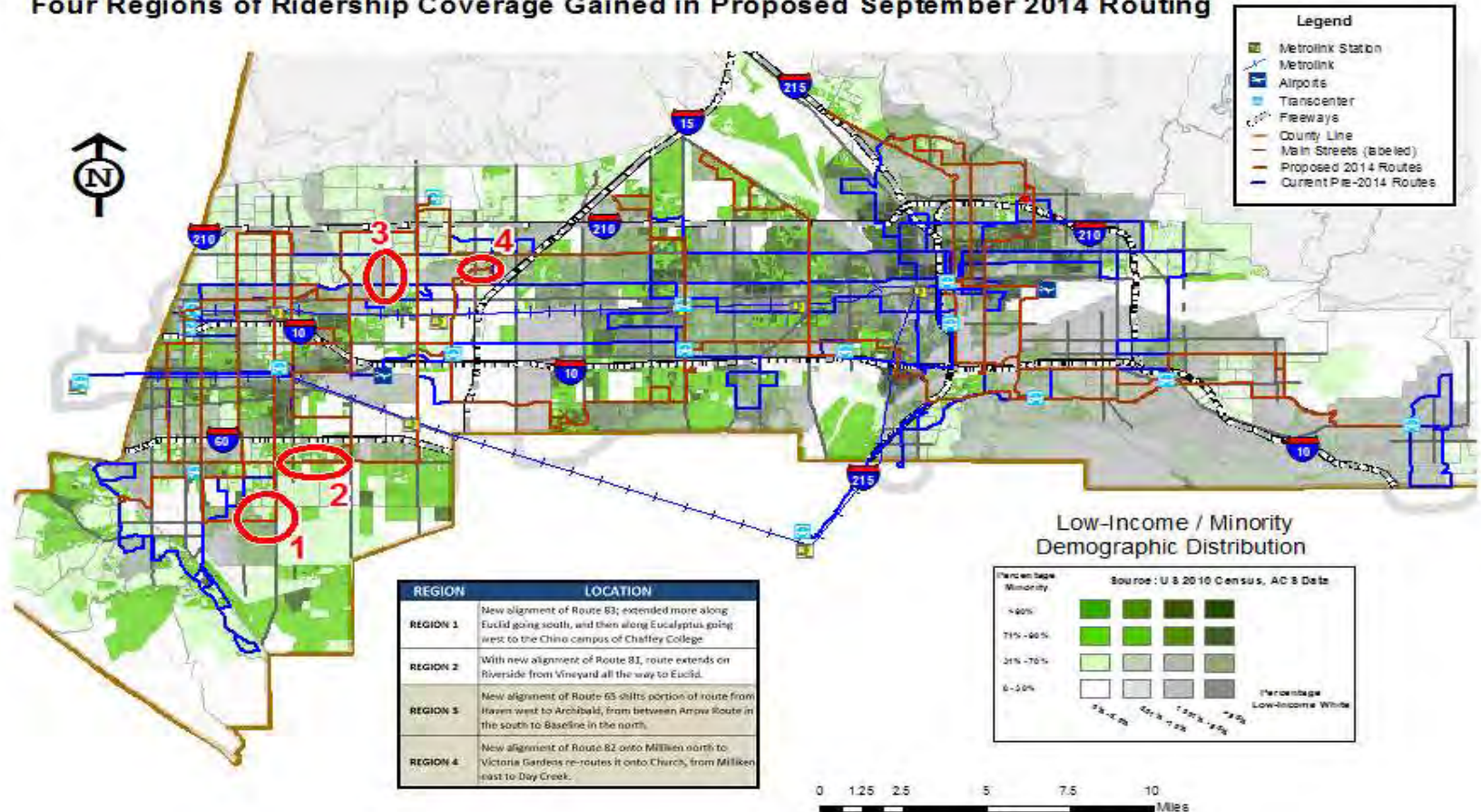
Accompanying the alignment and frequency changes for some routes, there will be additions made to four specific sections of Omnitrans' service area. Four regions were identified wherein Omnitrans gains service coverage by realignments; these were a result of the overarching strategy to increase and modify long-requested north-to-

south corridor service to feed into the successful east-west running routes 61, 66, and 67, all in the West Valley.

In all cases, residents had either requested new routing, or demographic and/or ridership data suggested a local need, or there was an unmet need in connecting riders to a new major trip generator, or there was a noticeable gap in service along a corridor which could be fixed by reducing

Exhibit 166: Regions of Ridership Coverage Gained in 2014 Service Area

### Four Regions of Ridership Coverage Gained in Proposed September 2014 Routing



**Exhibit 167: Demographic Analysis of Regions Gained in 2014 Service Area**

REGION	ROUTE SECTION GAINED Within 1/2-Mile Pedestrian Buffer	ROUTE EFFECT ED	Total Population	Total Whites (Tot Pop - Minorities)	Low Income Whites	Minorities	% Minorities	Total LIM	% LIW of LIM	% LIM
<b>COUNTYWIDE</b>		<b>NA</b>	2,035,210	677,598	67,850	1,357,612	<b>66.7%</b>	1,425,462	4.8%	<b>70.0%</b>
<b>Omnitrans' Service Area (One-half Mile of Any Fixed Route Service)</b>		<b>ALL</b>	1,253,669	307,119	26,669	946,550	<b>75.5%</b>	973,219	2.7%	<b>77.6%</b>
<b>1</b>	<b>ALONG EUCLID AND EUCALYPTUS, CHINO</b>	<b>83</b>	4,216	1,115	127	3,101	<b>73.6%</b>	3,228	3.9%	<b>76.6%</b>
<b>2</b>	<b>RIVERSIDE DRIVE, FROM VINEYARD TO EUCLID, SOUTHERN ONTARIO to CHINO</b>	<b>81</b>	6,191	1,682	75	4,509	<b>72.8%</b>	4,584	1.6%	<b>74.0%</b>
<b>3</b>	<b>ALONG ARCHIBALD FROM ARROW TO BASELINE, RANCHO CUCAMONGA</b>	<b>65</b>	17,309	7,401	677	9,908	<b>57.2%</b>	10,585	6.4%	<b>61.2%</b>
<b>4</b>	<b>ALONG CHURCH, FROM MILLIKEN TO DAY CREEK, RANCHO CUCAMONGA</b>	<b>82</b>	5,105	1,784	43	3,321	<b>65.1%</b>	3,364	1.3%	<b>65.9%</b>
<b>COMPARATIVE ROUTE BUFFER DEMOGRAPHICS</b>										
<b>1</b>	<b>ROUTE 83</b>		89,510	23,660	764	65,850	<b>73.6%</b>	66,614	1.1%	<b>74.4%</b>
<b>2</b>	<b>ROUTE 81</b>		93,418	25,005	1,405	68,413	<b>73.2%</b>	69,818	2.0%	<b>74.7%</b>
<b>3</b>	<b>ROUTE 65</b>		52,472	11,099	693	41,373	<b>78.8%</b>	42,066	1.6%	<b>80.2%</b>
<b>4</b>	<b>ROUTE 82</b>		96,228	15,442	486	80,786	<b>84.0%</b>	81,272	0.6%	<b>84.5%</b>

redundant service along adjacent corridors. In cases such as these, the areas served may have lower proportions of minority residents which have already been served by the route being realigned. As such, demographic comparisons in these cases should be made to original route alignments and not to the service area overall.

The four gains made in service are shown in Exhibit 166. Exhibit 167 shows the demographic characteristics within ½ mile walking distance of the route before and after the proposed change,

compared to the overall service area and county. Owing to the fact that these are routes that have originally served portions of our service area which have lower proportions of minority residents, comparisons are made to pedestrian buffers about the original route as well, as seen in Exhibit 167.

The differences between route minority demographics are illustrated in the following table (Exhibit 168), where the demographic makeup of the cities the routes fall within is shown. These data illustrate an important point: namely, that

different cities have different minority shares, and the routes that serve them must also share those respective demographic characteristics. For this reason, it is important not always to compare the demographics of a proposed change to that of the service area, but to the demographic character of the region the route originally served, as shown in Exhibit 168.

Exhibit 168: Proportion and Number of Minorities in Omnitrans' Service Area by City

CITY	Total 2010 Population	Number "White, Non-Hispanic"	Percentage "White, Non-Hispanic"	Proportion (%) Minority	Number Minority
Chino	78,000	21,684	27.8%	72.2%	56,316
Chino Hills	75,000	25,050	33.4%	66.6%	49,950
Colton	52,000	6,760	13.0%	87.0%	45,240
Fontana	196,000	30,184	15.4%	84.6%	165,816
Grand Terrace	12,000	5,568	46.4%	53.6%	6,432
Highland	53,000	16,324	30.8%	69.2%	36,676
Loma Linda	23,000	8,510	37.0%	63.0%	14,490
Montclair	37,000	5,328	14.4%	85.6%	31,672
Ontario	164,000	29,848	18.2%	81.8%	134,152
Rancho Cucamonga	165,000	70,455	42.7%	57.3%	94,545
Redlands	69,000	37,260	54.0%	46.0%	31,740
Rialto	99,000	12,474	12.6%	87.4%	86,526
San Bernardino	210,000	39,900	19.0%	81.0%	170,100
Upland	74,000	32,708	44.2%	55.8%	41,292
Yucaipa	51,000	33,609	65.9%	34.1%	17,391
<b>Average or SUM</b>	<b>1,358,000</b>	<b>375,662</b>	<b>27.7%</b>	<b>72.3%</b>	<b>982,338</b>
Contribution of Unincorporated Areas	126,000	41,202	32.7%	67.3%	84,798
<b>Base Population for Service Area</b>	<b>1,484,000</b>	<b>416,864</b>	<b>28.1%</b>	<b>71.9%</b>	<b>6</b>
<b>SAN BERNARDINO COUNTY (2011)</b>	<b>2,035,000</b>	<b>665,445</b>	<b>32.7%</b>	<b>67.3%</b>	<b>1,369,555</b>

\* NOTE: These data are derived with consideration of Whites, Not Hispanic numbers. These are the **true** minority count and proportion data. Minority, then, is defined as total population minus "White Alone (not Hispanic or Latino)". By default, all not "white alone" equal "minority". Data obtained for county and by city from State and County QuickFacts, U.S. Census Bureau online (<http://quickfacts.census.gov/qfd/states/06/06071.html>); data is for the years 2010 or 2011.

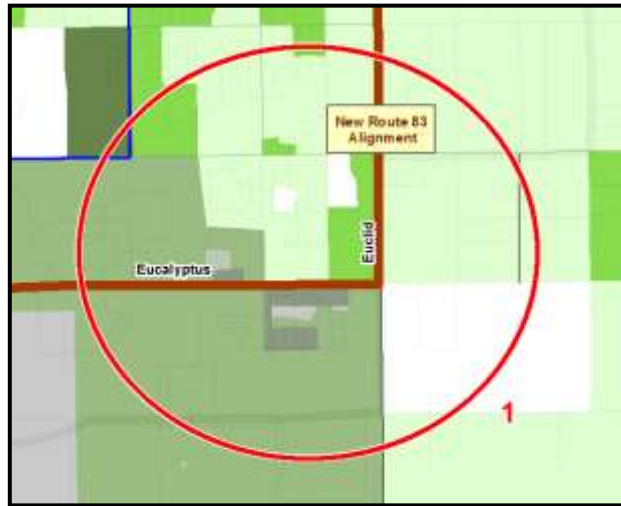
Exhibit 169: Along Riverside Drive from Euclid to Vineyard

The four regions are examined in detail, following:

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- ▶ **ALONG EUCLID AND EUCALYPTUS, CHINO**  
New alignment of Route 83, extended more along Euclid going south, and then along Eucalyptus going west to the Chino campus of Chaffey College.

Exhibit 170: Along Euclid and Eucalyptus



This alignment makes the route more efficient, as it reduces unnecessary turns (Exhibit 170). It serves much the same area outside of the Chino campus of Chaffey College, and utilizes the newly opened section of Eucalyptus (College Parkway) which was built to serve the campus itself. The demographics of this region do not greatly differ from those of the original alignment of Route 83 (73.6% minority to 73.6% minority). This realignment does not impose disparate treatment or disparate impact.

- ▶ **RIVERSIDE, FROM VINEYARD TO EUCLID, SOUTHERN ONTARIO to CHINO** Extends route on Riverside Drive from Vineyard to Euclid.



With this new alignment of part of old Route 81 (which is renamed the new Route 84), the route extends along Riverside Drive from Vineyard all the way to Euclid and makes a more direct connection that did not exist before (see Exhibit 169). The demographics of this buffer region do not greatly differ from that which existed for the route (Route 81, that is) before realignment and creation of the new Route 84 (72.8% minority in the new area versus 73.2% for the buffer around the old Route 81). This realignment does not impose disparate treatment or disparate impact.

- ▶ **ALONG ARCHIBALD FROM ARROW TO BASELINE, RANCHO CUCAMONGA** New alignment of Route 65 shifts a portion of route from Haven to Archibald, from between Arrow Route in the south to Baseline in the north.

Exhibit 171: Archibald from Arrow to Baseline



The demographic character of this route differs significantly from the old Route 65, but this is due to the fact that the new alignment of the route incorporates large chunks of other routes, too (Exhibit 171). A direct comparison here of the new alignment of Route 65 to the old Route 65 alignment is not entirely fair, as the route has undergone extensive change—so much so, that it is almost of a different demographic character from the old route.

The original route 65 remained in Chino and Montclair primarily, and did not venture north of



the Montclair Transit Center. In its new iteration, the latest alignment nearly doubles the route's length, and extends it farther north into cities which have very different demographics. As such, a fairer comparison might be to routes that serve Upland and Rancho Cucamonga more. Furthermore, the alignment along this section of Archibald was to remedy a different sort of situation: both Vineyard and Haven have other routes traversing them, and in order to connect to Chaffey College (the major end-of-line trip generator), the route would have to traverse either of those thoroughfares, or along Archibald, which was not being served at all.

By designing the alignment to traverse along Archibald, any unmet need is served, albeit for a portion of the community with greater numbers of low-income white (and fewer minority) residents. Vineyard and Haven remain served by other routes, an unmet need is resolved, and redundancy of service (especially along Haven) is reduced. In terms of demographic comparisons, Rancho Cucamonga has 57.3% minority, while within the buffer region of this section of Route 65, there are 57.2% minorities, which is essentially indistinguishable from Rancho Cucamonga overall.

A further comparison can be made between pedestrian buffers about the old combination of

routes 65 and 68 versus the new combination of routes 65 and 68; this was done, and the results determined that there was essentially no difference demographically between the old and new pedestrian buffers, as shown in Exhibit 172:

As can be seen, both buffers have 73.1% minority. Therefore, this realignment does not impose disparate treatment or disparate impact.

▶ **ALONG CHURCH, FROM MILLIKEN TO DAY CREEK, RANCHO CUCAMONGA** New alignment of Route 82 onto Milliken north to Victoria Gardens to better serve the environs around this trip generator.

Exhibit 173: New Victoria Gardens Routing



For a long time, better service to Victoria Garden had been requested by riders. This alignment of Route 82 onto Milliken north to Victoria Garden re-routes it onto Church, from Milliken east to Day Creek, and seeks to address that long unmet need namely, serving Victoria Gardens directly, and directing ridership to this important trip generato

Exhibit 172: Demographic Analysis of Pedestrian Buffers for Old and New Routes 65 and 68

ROUTE SECTION GAINED Within 1/2-Mile Pedestrian Buffer	Total Population	Total Whites (Tot Pop - Minorities)	Low Income Whites	Minorities	% Minorities	Total LIM	% LIW of LIM	% LIM
<b>OLD Buffer 1</b>	152,910	41,138	4,348	111,772	<b>73.1%</b>	116,120	3.7%	<b>75.9%</b>
<b>NEW Buffer 2</b>	152,576	41,065	4,340	111,511	<b>73.1%</b>	115,851	3.7%	<b>75.9%</b>

(Exhibit 173). It is true that the demographic profile of this new section is not in character with historical Route 82, but it is in keeping with the demographics of this portion of the city of Rancho Cucamonga, and it is to this that demographic comparisons should be made. Rancho Cucamonga has 57.3% minority residents, while along this stretch of Church, there are 65.1% minorities. This new alignment does not impose either disparate treatment or disparate impact.

### 13.2.5 Analysis IV: Proposed Elimination of OmniLink Service

It is proposed to eliminate the curb-to-curb service known as OmniLink from the two communities it serves: Chino Hills and Yucaipa. In lieu of this, if the proposal is not passed, it is proposed to increase fares for OmniLink service for the same communities (this latter option was analyzed in the Fare Equity Analysis).

OmniLink has served the two communities of Chino Hills and Yucaipa for many years. However, it has always been a poor performer and an inefficient and expensive service to provide. In 2010, Omnitrans initiated a series of local circulator routes in these communities utilizing essentially the same smaller, cut-away type of transit vehicles and called OmniGo. Since then, OmniGo has grown to one route in Chino Hills (Route 365) and three routes in Yucaipa (308, 309, and 310), as well as one route serving the community of Grand Terrace (Route 325). In the last several years, OmniGo has continued to grow and to have increasing ridership, and is now consistently performing better than OmniLink service, while OmniLink remains one of the most expensive of Omnitrans' services. By eliminating

the cost-ineffective service of OmniLink, Omnitrans can better offer these resources into expansion of OmniGo to serve these communities. Demographic analysis of the cities of Chino Hills and Yucaipa (see Exhibit 155) demonstrates that neither city exceeds or even equals the proportion of minority or LIM residents for that of the County overall or for Omnitrans' service area. Elimination of OmniLink, therefore, does not impose disparate treatment or disparate impact.

# 14 PUBLIC HEARINGS

As part of the implementation process of OmniConnects, Omnitrans embarked on informing and obtaining comments from its riders, cities, stakeholders, neighboring transit providers, county agencies and San Bernardino Valley's Consolidated Transportation Services Agency (CTSA) Valley Transportation Services (VTrans) about the proposed changes. This process is critical to the success of the OmniConnects Plan. Public input was a vital element of ensuring the public was made aware of the following proposed activities within OmniConnects:

- ▶ Financial projections
- ▶ Proposed fare increases
- ▶ Fixed route service restructuring
- ▶ Proposed elimination of OmniLink
- ▶ Proposed Access fare zone boundary changes
- ▶ Long term capital proposals

Input from the initial outreach effort completed during the COA study were used in developing the plan; further ensuring Omnitrans the public's comments and concerns were integrated into the OmniConnects plan.

## 14.1 Public Outreach Consideration and Schedule

To ensure the riders, city officials and stakeholders were all given ample time and opportunity to provide comments and feedback on the proposed elements of the OmniConnects plan, Omnitrans staff followed the public hearing protocol and set the following hearing locations, dates and times to receive comments, Exhibit 174: OmniConnects Public Hearing Schedule. In accordance with FTA

regulations the schedule of these hearings was advertised in two local newspapers within the San Bernardino Valley: San Bernardino Sun and the Inland Empire Daily Bulletin.

Public hearings were evenly dispersed throughout Omnitrans' service area, and seven out of the 11 locations took place at major transit centers. Information was provided to the public in both English and Spanish at all locations.

In addition to the general public hearings, Omnitrans also hosted two meetings for city and county staff representatives on the following dates and locations:

- ▶ Tuesday, April 1, 2014, 10:00 am to 11:30 am, Ovitt Family Community Library, Meeting Room, 215 East C Street, Ontario, California 91764
- ▶ Wednesday, April 2, 2014, 9:30 am to 11:00 am, Omnitrans, Large Lobby Conference Room, 1700 West Fifth Street, San Bernardino, California 92411

Omnitrans also made a presentation at the Public and Specialized Transportation Advisory and

**Exhibit 174: OmniConnects Public Hearing Schedule**

Date	Location	Time
Monday March 24, 2014	<b><u>SAN BERNARDINO</u></b> Feldheym Library, Kellogg Room B AND Fourth Street Transfer Center	10:00 a to 2:00  3:30 pm 6:00 p
Tuesday March 25, 2014	<b><u>CHINO</u></b> City Council Chambers AND Chino Transit Center	9:00 am 12:00 p  2:00 pm 6:00 p
Wednesday March 26, 2014	<b><u>REDLANDS</u></b> Redlands Transfer Mall AND City Council Chambers	1:00 pm 3:00 p  5:00 pm 8:00 p
Thursday March 27, 2014	<b><u>FONTANA</u></b> Transit Center	7:00 am 10:00 a
Thursday March 27, 2014	<b><u>RANCHO CUCAMONGA</u></b> Chaffey College Transit Center	1:00 pm 3:00 p
Thursday March 27, 2014	<b><u>ONTARIO</u></b> Senior Center, 225 East B Street	5:00 pm 8:00 p
Monday March 31, 2014	<b><u>MONTCLAIR</u></b> Transit Center	9:00 am 12:00 p
Monday March 31, 2014	<b><u>YUCAIPA</u></b> Transit Center	2:30 pm 6:30 p

Coordination Council (PASTACC), which is an advisory body to the SANBAG regarding public transit and specialized transportation needs, issues and opportunities.

In addition to public hearings, Omnitrans' proposals were marketed through the various

Attachment: City of Chino Appeal Request Form and Supporting Documentation (Appeal of the Draft

social media outlets managed by the Marketing Department. There were posts on Omnitrans.Org and an official press release that was picked up by a few local papers. On-board take-one fliers were placed on our buses and hand-outs of the proposals were available online and at each public hearing location.

The OmniConnects plan was featured in the media outlets: The Transit Coalition posted five different blogs soliciting public awareness on the A Better Inland Empire blog. Newspaper articles were also printed in the San Bernardino Sun and the Yucaipa News-Mirror that were in addition to the press released by Omnitrans' Marketing Department.

### 14.1.1 Employee Outreach

In addition to scheduling public hearings for the general public, Omnitrans held two information sessions for employees, to ensure operators, who are the first line of contact with riders, were aware of proposed changes. The sessions were held Monday, March 10, 2014, from 11 A.M. -2 P.M. at the driver's lounge at each of the East and West Valley Omnitrans facilities.

Staff provided the employees the opportunity to comment on the proposed elements within the OmniConnects Plan. Comments received by operators were taken into consideration. In addition to the one-to-one interaction, the Planning staff displayed the information boards at each location for a week to allow any employee not present an opportunity to view and comment on the plans content.

## 14.2 Comments and Feedback

Omnitrans staff spoke with approximately 450 people throughout the course of the scheduled public hearings. A total of 191 comments were received. The following is a breakdown of those comments:

- ▶ 102 written comments were submitted at the scheduled public hearing locations.
- ▶ 58 emails were received.
- ▶ 27 phone calls
- ▶ 4 comments were submitted from city representatives.

Comments received were categorized into four sections: service, fares, OmniLink and other. The breakdowns of the comments tied back to those categories were as follows:

- ▶ Service: 55%
- ▶ Fares: 8%
- ▶ OmniLink: 19%
- ▶ Other: 18%

Planning staff also returned calls regarding questions relating to all the proposals listed in OmniConnects to ensure the public understood all the proposals. The comment period was open to the public and employees and went from February 27, 2014 through April 7, 2014.

### 14.2.1 Service Comments

The majority of the comments regarding service were to request additional service on fixed routes in the form of an increase of frequency or span of service hours and days.

Comments were also received regarding the OmniConnects Plan proposed rerouting and/or elimination of service along some streets.

Of these comments a reoccurring request was made to not eliminate service to Chaffey College's Learning Development Center (LDC) which was part of proposal on fixed route 65. Staff has since looked at the proposed Rout 65 map configuration and added back the direct service to LDC. While the proposed route change was in accordance with the half-mile walking buffer the type of establishment substantiated the direct service.

Where applicable, riders were informed of other transportation programs within the area, such as VTrans upcoming programs. Such transportation projects are geared to improve mobility to seniors, persons with disabilities and persons of low income, and may be able to fill in where fixed-route service is not available.

### 14.2.2 Fare Comments

Many comments voiced concerns and opposition to the proposal to raise fare. Several riders did express gratitude to Omnitrans for maintaining service while not raising fares in over five years and warranted the proposal. Additionally, most riders commented on the ease of transaction in regards to exact change. However, negative feedback and comments were also provided to Omnitrans relating to low and fixed-income constraints.

Staff responded to these comments by informing the public that fare increases are vital to maintaining current service levels and meeting the requirements mandated to all transit agencies to

maintain a 20% farebox ratio and close the \$12.8 funding shortfall projected through 2020. Riders were encouraged to take advantage of multi-day passes offered at various outlets throughout our service area. Programs such as GoSmart also have been successful in alleviating costs for eligible riders.

Staff also informed the public that while three fare increases were proposed within the OmniConnects plan, public hearings and final approval by Omnitrans' Board of Directors would be required to implement the fare increases.

### 14.2.3 OmniLink Comments

Current OmniLink service operates in the cities of Chino Hills and Yucaipa. Both are proposed to be eliminated in September 2014. All comments received relating to this category related to the proposed elimination of OmniLink service in the City of Yucaipa. Staff did inform the current riders using the OmniLink service about the proposed elimination of service during reservation calls as well as at all the public hearing locations.

Staff has taken all the comments into consideration. A fare increase has been proposed for OmniLink, in the event that Omnitrans Boards of Directors decides to keep OmniLink in some form or completely intact.

### 14.2.4 Other Comments

The remaining 18% of comments categorized under "Other" were relating to bus stop placement and amenities. Staff informed the public that bus stop amenities are prioritized by several factors including, ridership activity at the bus stop, available infrastructure space (sidewalk depth and ADA accessibility) and funding. Any request for a particular bus stop location will be taken into consideration in the future transit enhancement projects.

*Detailed public comments are available upon request.*



# Service Plan 2020-2021



April 22, 2020

Omnitrans  
1700 W. Fifth St.  
San Bernardino, CA 92411

Attachment: City of Chino Appeal Request Form and Supporting Documentation (Appeal of the Draft RHNA Allocation for the City of Chino)

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## 1. INTRODUCTION

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The Fiscal Year 2020-2021 (FY2021) Service Plan is called the ConnectForward Service Plan and is the first-year implementation of the forthcoming ConnectForward Short-Range Transit Plan (SRTP) for Fiscal Years 2021-2025. This ConnectForward Service Plan provides an overview of Omnitrans' service offerings, service changes, service policy changes and fare policy for FY2021.

This ConnectForward Annual Service Plan finds Omnitrans, the San Bernardino Valley and the world in an unprecedented situation responding to the COVID-19 pandemic. The service plan is both:

- 1) the culmination of nearly a year of work designed to position Omnitrans on stable long-term financial footing by reducing service levels by approximately 11%; and,
- 2) a rapidly evolving, flexible and scalable plan that can match service levels to the fluid ridership, workforce, funding and economic realities faced in light of the COVID-19 pandemic.

Generally, this document is focused on the long-term ConnectForward Plan that began with the work of the joint Omnitrans and SBCTA Ad Hoc Committee that included both service reductions and increased funding. Most of this plan was developed long before Coronavirus and COVID-19 impacted system ridership and revenue.

While the service reduction plan was already in development for September 2020, starting in March 2020, Omnitrans implemented the Emergency Service Deployment plan due to the impacts of COVID-19. This initially brought service levels down approximately 35% on March 23<sup>rd</sup> and subsequently down 45% on April 13<sup>th</sup>. As the pandemic fades, Omnitrans will need to determine both when resume service levels and to what level. Besides answering these questions based on social distancing guidelines and stay at home orders, the response is complicated by economic uncertainty and the potential change in travel patterns as employers and schools shift further towards online settings.

Mitigating some of the short-term economic concerns, transit agencies including Omnitrans benefit from the economic stimulus elements of the Coronavirus Aid, Relief, and Economic Security (CARES) Act. The CARES Act funding can be used to cover operating costs, lost fare revenue and similar expenses that resulted from the pandemic. While this funding will be crucial to overcoming near-term challenges, the path towards long-term recovery remains uncertain. As a result the CARES Act funding must be judiciously utilized to ensure it can sustain essential transit service until both the pandemic is over and the economy rebounds.

## 2. OMNITRANS SERVICE OFFERING

At the close of Fiscal Year 2020, Omnitrans’ Family of Services includes Bus Rapid Transit (BRT), Express and Local Bus service, Community Circulator service and ADA Paratransit service. These can be seen in Exhibit 1.

In FY2021, Omnitrans proposes adding a new service type to the family of service. This service is MicroTransit, which is a real-time customer-requested, technology-enabled, automatically dispatched, on-demand service. Omnitrans has partnered with transportation contractor First Transit and technology provider RideCo to initiate a MicroTransit pilot program in Chino Hills. First Transit will provide economies of scale in MicroTransit service delivery as First Transit will also provide OmniAccess and OmniGo service starting in July 2020. RideCo has implemented MicroTransit technology in dozens of locations throughout North America and was recently awarded a contract as the MicroTransit technology partner with LA Metro. One of the elements of the FY2021 Marketing Plan will be to brand and promote this pilot MicroTransit Service.

**Exhibit 1: Omnitrans Family of Service Offerings**







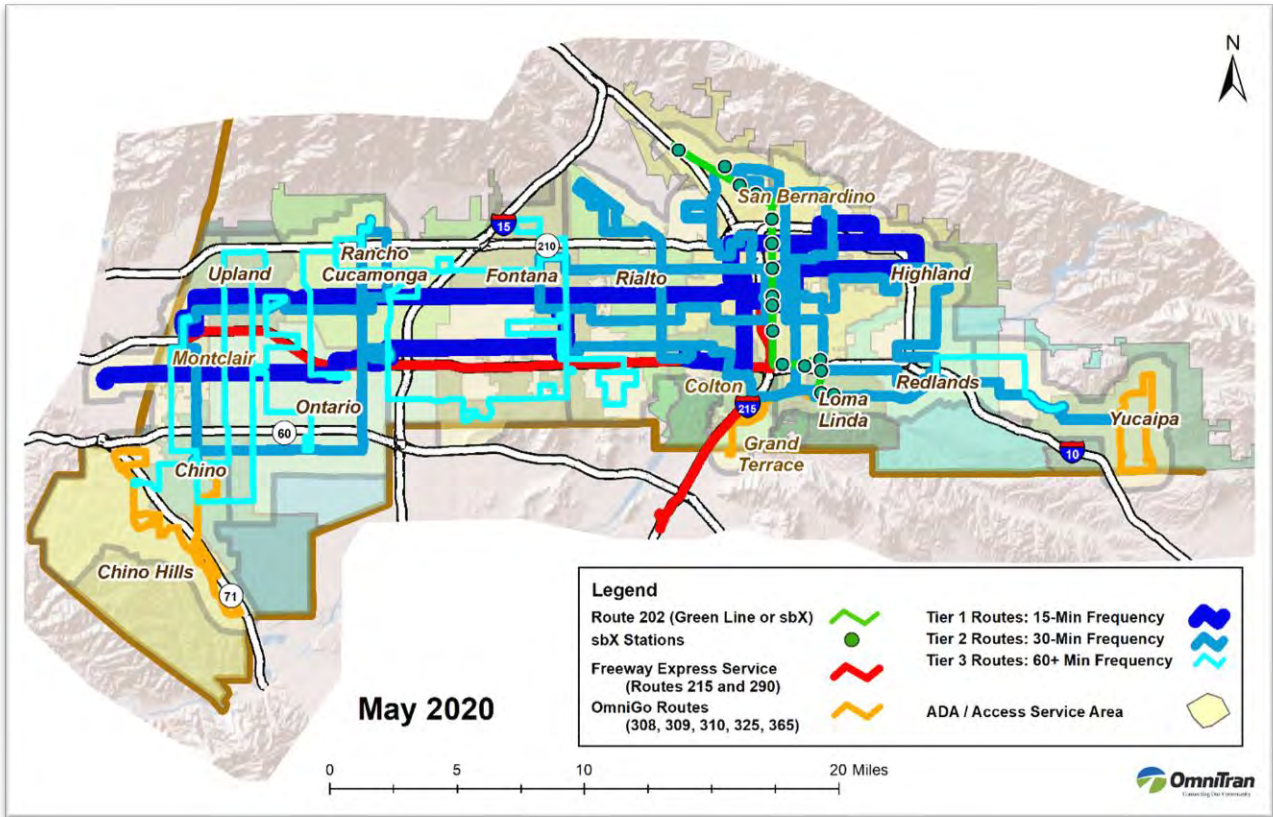
Service	Type	Brand	Image	Description
<b>Fixed Route</b>	Bus Rapid Transit (BRT)	sbX		BRT service mirrors light-rail service with dedicated lanes, amenities, stations and vehicles.
	Express	Omnitrans		Freeway bus service connecting two or more areas of highly concentrated activity.
	Local	Omnitrans		Traditional large bus service operating on a set route with a set schedule at defined frequencies.
	Community Circulator	OmniGo		Smaller bus service designed to offer lifeline mobility for areas with relatively low population and employment density.
<b>Demand Response</b>	MicroTransit	To be determined		Real-time customer requested, technology-enabled, automatically dispatched demand responsive service
	ADA Paratransit	OmniAccess		Curb-to-curb service provided to comply with the Americans with Disabilities Act (ADA) that is provided within 3/4-mile of a fixed route service.
<b>Special Transit Services</b>				As the designated Consolidated Transportation Services Agency (CTSA), Omnitrans offers a variety of mobility services including Travel Training, Volunteer Driver programs, a Lyft & Taxi program, and many Regional Mobility Partnership programs.

Exhibit 2: Map of Omnitrans Family of Service Offerings



Omnitrans’ current service offerings can be seen in the map in Exhibit 2. Omnitrans proposes eight types of service changes during FY2021. These service change types include:

- 1) Route eliminations,
- 2) Frequency changes,
- 3) Map changes,
- 4) New routes,
- 5) New services,
- 6) Contracting services with smaller vehicles,
- 7) Access map changes, and
- 8) Access policy changes.

Section 3 of this report provides a high-level description of the data used to make these different service recommendations. Section 4 of this report provides the detailed service changes by route and community within these eight types of service changes.

Collectively these changes reduce service by 11% of revenue service hours during the year, reducing overall service by slightly more than the goal of a 71,000 revenue hours and \$5 million service reduction.

### 3. SERVICE CHANGE ANALYSIS

The proposed service changes described in the FY2021 ConnectForward Annual Service Plan are the result of a thorough data analysis that evaluated current transit ridership levels and community needs compared to both existing standards and comparatively to similar services offered by Omnitrans. This analysis was shared with Omnitrans Executive, Administration and Finance, and the Operations and Safety Committees in August 2019 and Board of Directors in September 2019.

At its November 2019 meeting, the Omnitrans Board of Directors adopted eight guiding principles for the ConnectForward Plan including:

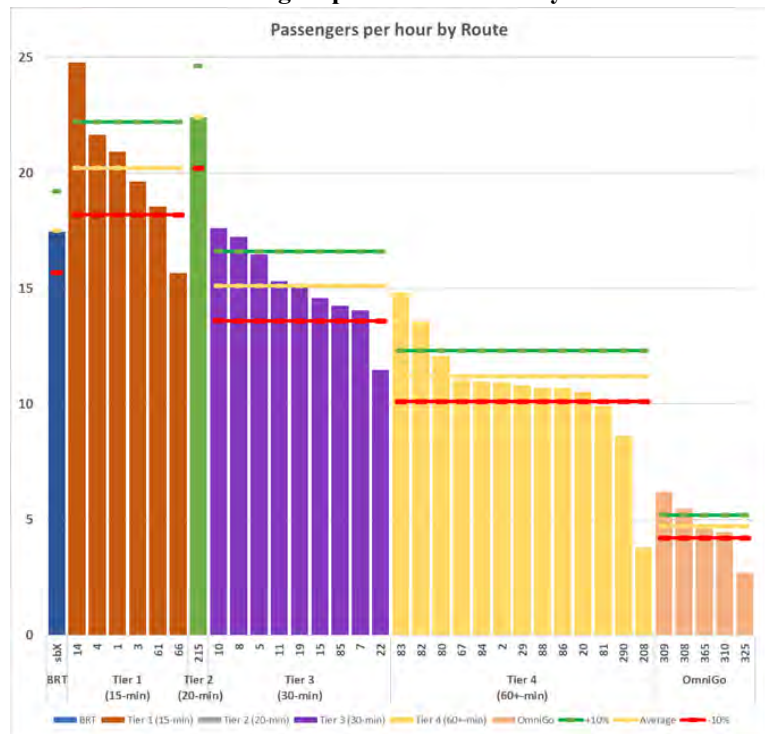
- 1) Minimize Customer Impact
- 2) Business Approach: Maximize Efficiency & Productivity
- 3) Maintain Core Weekday Productivity Network
- 4) Reduce Coverage Area Duplication
- 5) Provide Only Mandated ADA Service
- 6) Maintain Service Quality
- 7) Minimize Impact on Employees
- 8) Provide Service to All JPA Members

These goals provided a framework for Omnitrans staff to develop the recommendations in this Plan using the customer experience and transit needs as a guidepost. Specific recommendations were then developed based on a detailed data analysis.

One of the first key analyses was comparing each route’s productivity measured by passengers per hour compared against routes in the same service tier (routes with a comparable headway). This analysis can be seen for weekdays in Exhibit 3. Routes operating at their tiers respective yellow line were operating at the peer route average. Routes operating near the red line, were operating at 10% below the peer route average. These routes near, at, or below the redlines were initial areas to look at for service reductions. This analysis was also completed for Saturday and Sunday service.

Another key area that was evaluated was each route’s performance by time of day. Specifically, a route

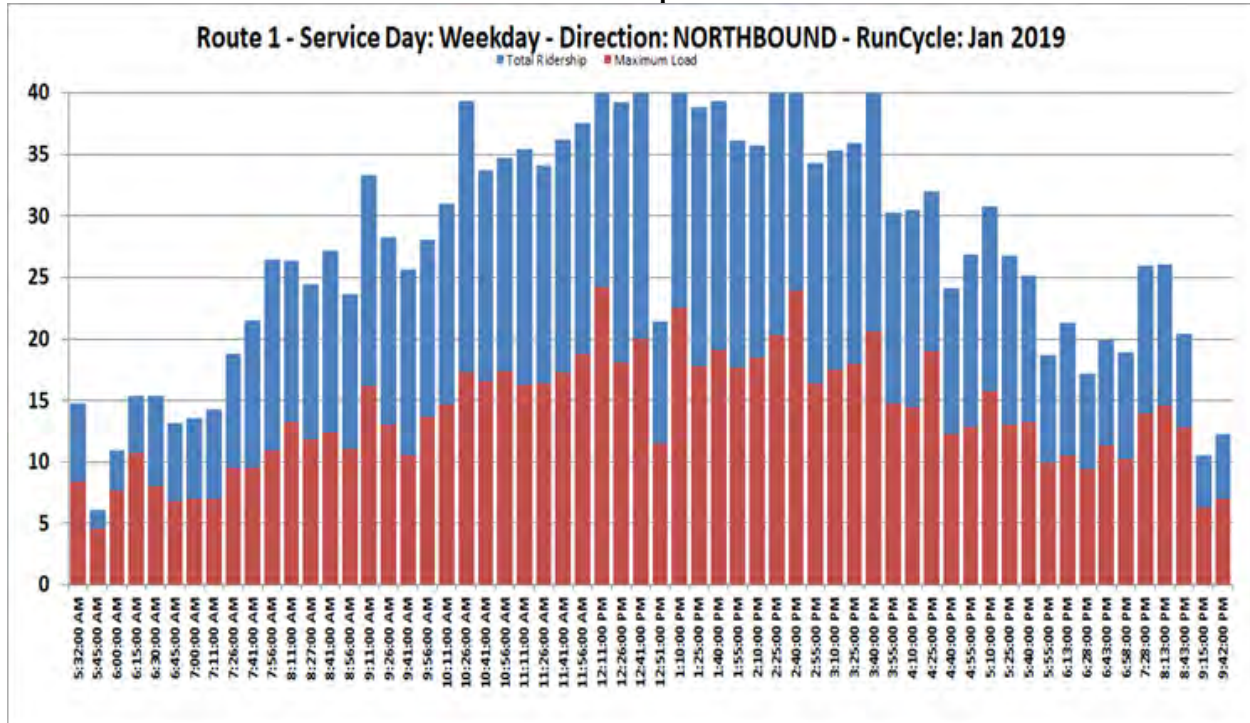
**Exhibit 3: Passengers per revenue hour by Route**



Attachment: City of Chino Appeal Request Form and Supporting Documentation (Appeal of the Draft RHNA Allocation for the City of Chino)

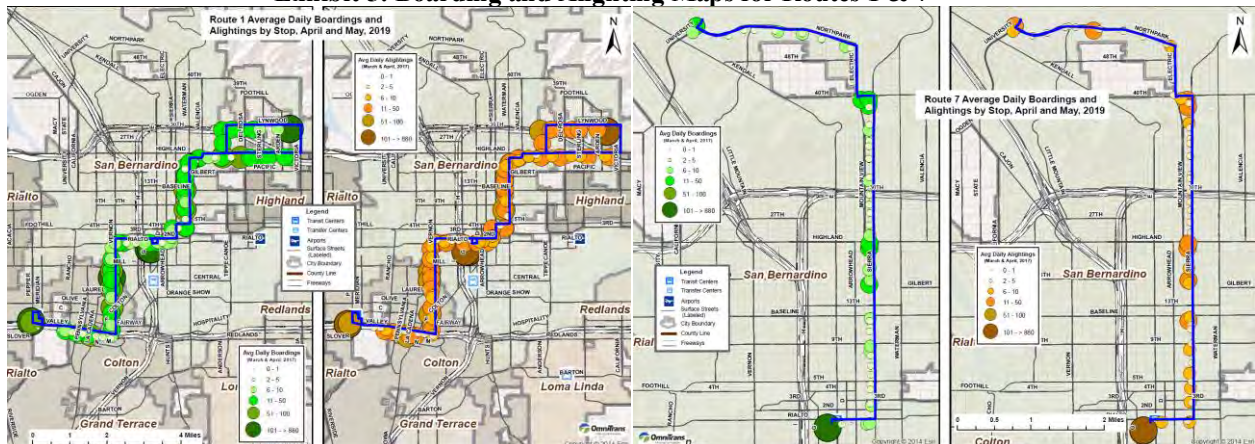
was evaluated based on two key factors: ridership by trip and peak passengers on board by trip, also called load factor. An example of this analysis can be seen in Exhibit 4 for Route 1. The red bars indicate the maximum passengers on board at one time on a typical trip and the blue bars represent the total passengers that typically board the bus on that trip. This analysis was completed by day of the week and direction. With this type of analysis, route schedules can be honed based on the typical ridership demand.

**Exhibit 4: Load Factor Report for Route 1**



Routes and services were also evaluated based on their geographic performance. Using automated passenger counter data, a route’s boardings and alightings can be measured on weekdays, Saturdays and Sundays. This allows for determination of areas of relative strength and weakness at the route and system level. A comparison of Route 1 and Route 7 boarding and alighting data can be seen in Exhibit 5. This data demonstrates, for example, that Route 1 has strong ridership

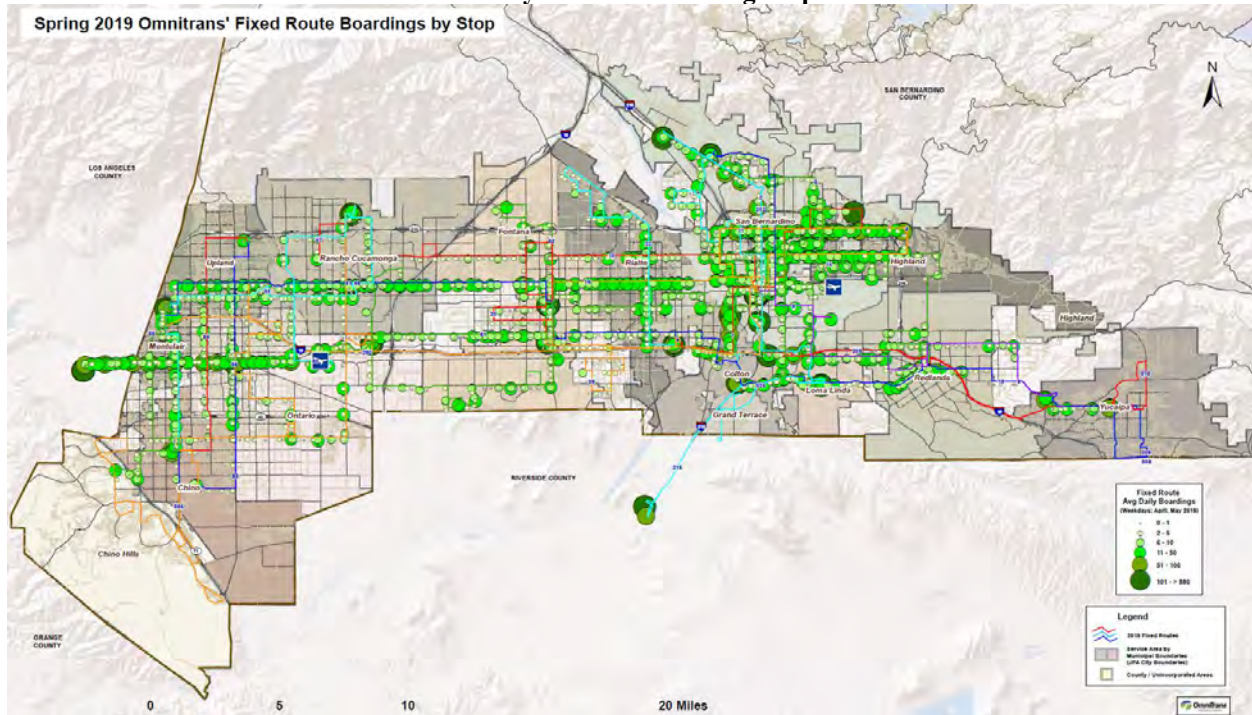
**Exhibit 5: Boarding and Alighting Maps for Routes 1 & 7**



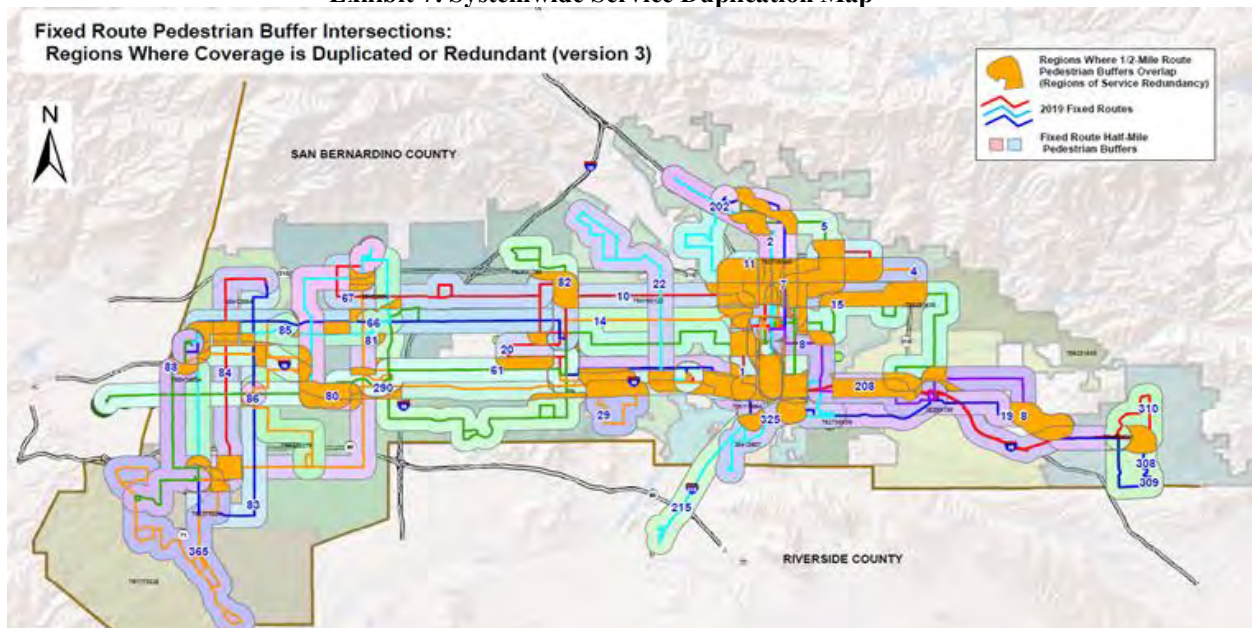
throughout its service area, while Route 7 does not. This kind of analysis led to the map change recommendation in this Plan.

This route level boarding and alighting data can also be evaluated systemwide as shown in Exhibit 6. This data is particularly valuable when compared to areas where there is service duplication which can be seen in the areas in orange in Exhibit 7. Combined this data allows for further recommendations of map changes in line with the goal of reducing coverage area duplication.

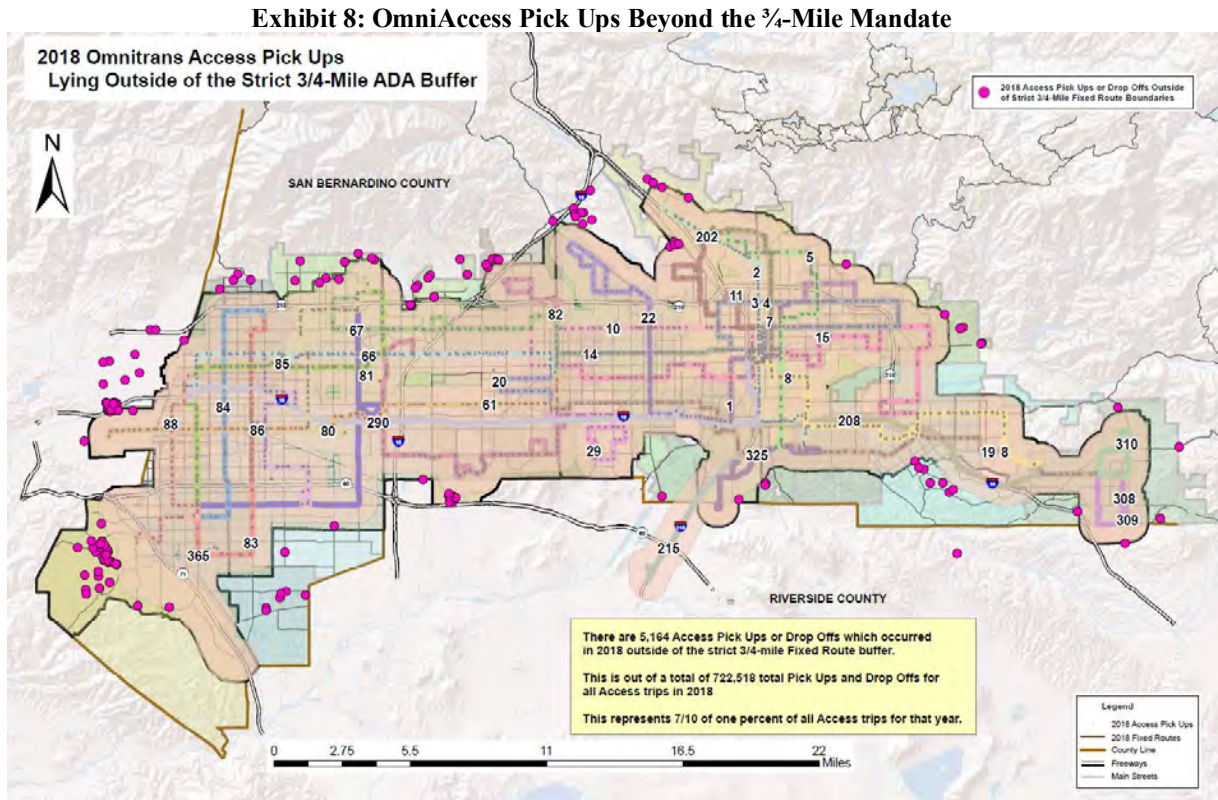
**Exhibit 6: Systemwide Boarding Map**



**Exhibit 7: Systemwide Service Duplication Map**



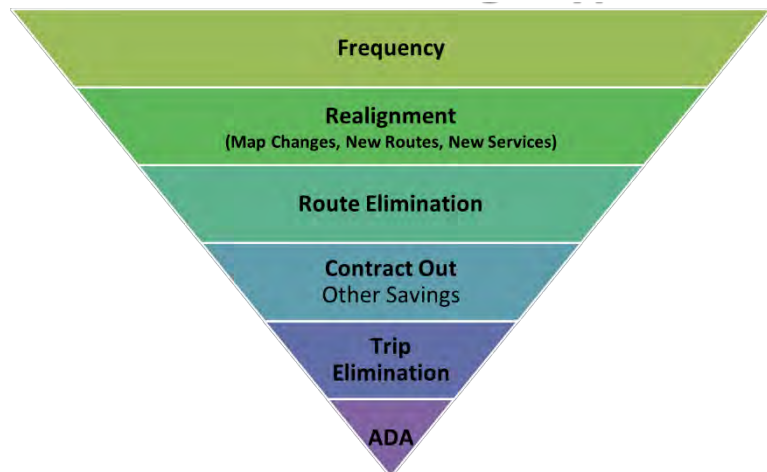
OmniAccess ADA Paratransit service can also be evaluated for geographic effectiveness. The ADA mandates that paratransit service be provided within 3/4-miles of fixed route service. With that mandate, Omnitrans typically cannot modify this required ADA service without changing the underlying fixed route network. However, the map in Exhibit 8 illustrates that nearly 1% of OmniAccess trips originate outside of the 3/4-mile mandate. Given that OmniAccess service is the most expensive service that Omnitrans operates, it is not sustainable to continue to provide this service beyond the mandate.



Omnitrans began providing “Beyond the Boundary” service in approximately 2009 after receiving a grant, which was fully expended by 2014. Now, the Special Transportation Service Department offers multiple options for these trips that did not exist in 2009.

After evaluating the full set of data that was highlighted above, a menu of service reduction strategies was developed and prioritized. These strategies are shown in Exhibit 9. The details of these proposals are described in Section 4 of this report.

**Exhibit 9: Service Change Types**





## 4. SUMMARY OF PROPOSED SERVICE

Based on the data analysis discussed in Section 3 of this report and after meeting with each JPA member, conducting public hearings and completing the required Title VI Service Equity Analysis, Omnitrans proposes eight categories of service changes:

- **Route Eliminations:** Routes 5, 7, 20, 80, 86, 308, 325 and 365
- **Frequency Changes:** Routes 2, 3, 4, 8, 14, 22, 61, 66, 290, 309, and 310
- **Map Changes:** Routes 1, 29, 81, 82, 83, and 84
- **New Routes:** Routes 6, 87, 305, 383
- **New Services:** MicroTransit Chino Hills
- **Contracting Services with Smaller Vehicles:** Route 12 and 29, Weekend service on 84 and 88
- **Access Map Changes:** Eliminate Beyond the Boundary Service and map changes associated with fixed route changes
- **Access Policy Changes:** 3-day reservation window

Collectively the goal of these service changes is to put Omnitrans on a long-term financially sustainable footing. Based on the financial forecasts developed in Summer 2019, this requires an 11% reduction in annualized fixed route revenue hours, equivalent to \$5 million and 71,000 revenue hours. Exhibit 10 shows that annualized directly operated service is planned to decline 13.1% equivalent to 85,274 annual hours. Contracted fixed route service is projected to increase 7,677 revenue hours (24.7%), bringing the total fixed route reduction to 11.4%. OmniAccess revenue hours are projected to decrease 5.6% bringing the systemwide decline to 10.3% on an annualized basis.

Each of these service changes is described in more detail in the subsections below.

**Exhibit 10: Revenue Hours by Service  
Current vs. Proposed**

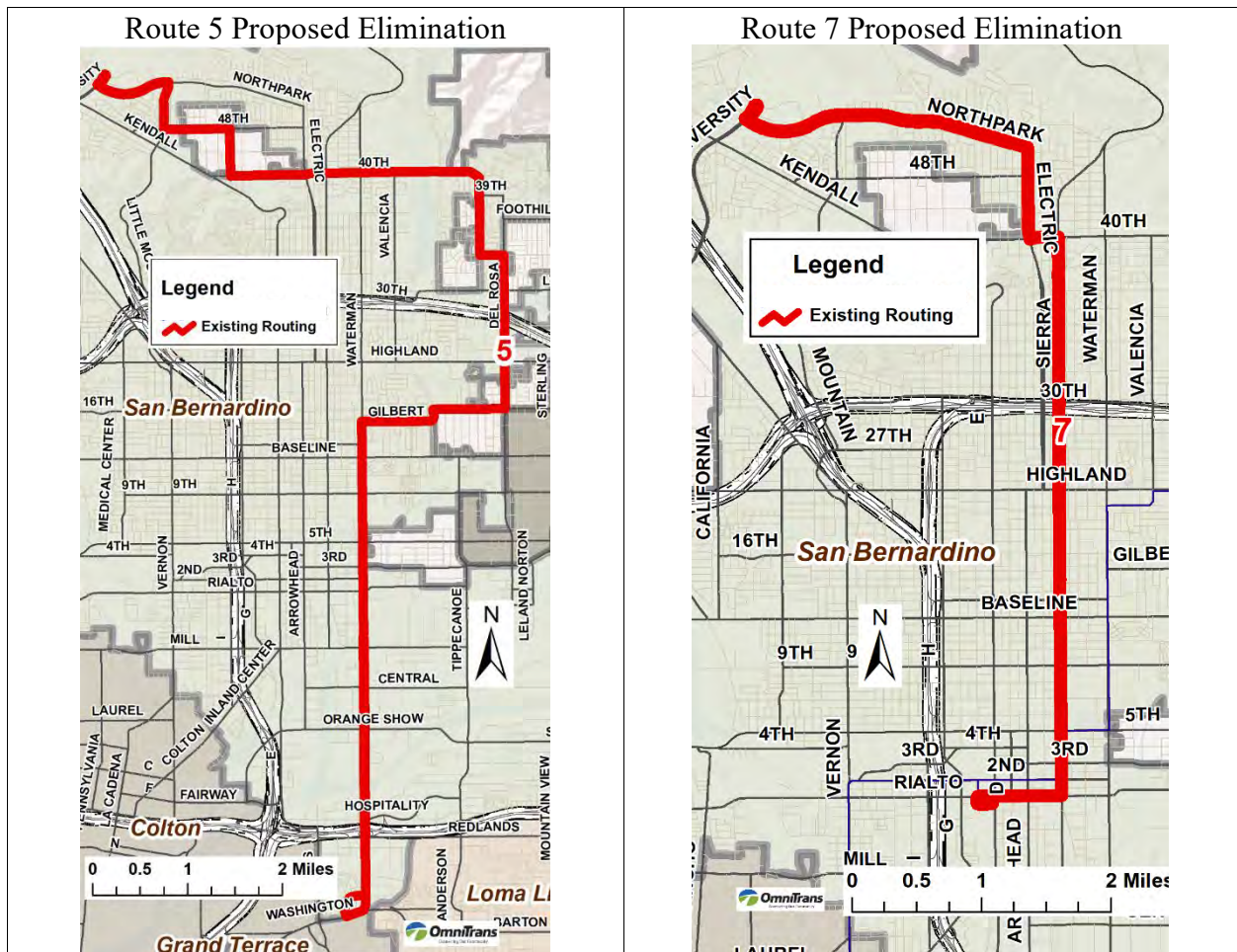
Route	Total Annual Revenue Hours			
	Current	Proposed	Δ	%Δ
1	42,941	42,962	21	0.0%
2	19,112	12,258	(6,854)	-35.9%
3	31,207	30,379	(828)	-2.7%
4	29,815	29,249	(566)	-1.9%
5	20,708	-	(20,708)	-100.0%
6	-	19,624	19,624	n/a
7	10,902	-	(10,902)	-100.0%
8	20,111	16,330	(3,782)	-18.8%
10	14,103	14,192	89	0.6%
12	16,021	-	(16,021)	-100.0%
14	34,481	32,418	(2,063)	-6.0%
15	35,153	35,152	(1)	0.0%
19	42,655	42,844	189	0.4%
20	4,279	-	(4,279)	-100.0%
22	18,456	12,919	(5,538)	-30.0%
29	3,017	-	(3,017)	-100.0%
215	12,485	12,713	228	1.8%
290	7,115	5,447	(1,668)	-23.4%
61	68,968	65,563	(3,405)	-4.9%
66	46,032	38,637	(7,395)	-16.1%
67	7,586	7,854	268	3.5%
80	10,223	-	(10,223)	-100.0%
81	15,181	9,218	(5,963)	-39.3%
82	19,274	19,464	190	1.0%
83	15,807	14,009	(1,798)	-11.4%
84	8,752	5,087	(3,664)	-41.9%
85	31,603	31,145	(457)	-1.4%
86	8,216	-	(8,216)	-100.0%
87	-	15,489	15,489	n/a
88	11,784	7,760	(4,025)	-34.2%
<b>40' Total</b>	<b>605,988</b>	<b>520,713</b>	<b>(85,274)</b>	<b>-14.1%</b>
<b>Green</b>	<b>45,998</b>	<b>45,998</b>	<b>-</b>	<b>0.0%</b>
<b>sbX</b>	<b>45,998</b>	<b>45,998</b>	<b>-</b>	<b>0.0%</b>
<b>Directly Operated</b>	<b>651,986</b>	<b>566,711</b>	<b>(85,274)</b>	<b>-13.1%</b>
29	-	3,590	3,590	n/a
305	-	5,508	5,508	n/a
308	3,131	-	(3,131)	-100.0%
309	8,481	1,833	(6,648)	-78.4%
310	2,096	1,785	(311)	-14.8%
320	1,196	-	(1,196)	-100.0%
325	5,018	-	(5,018)	-100.0%
329	563	-	(563)	-100.0%
365	10,563	-	(10,563)	-100.0%
365T	-	441	441	n/a
383	-	5,356	5,356	n/a
84 Weekend	-	1,916	1,916	n/a
88 Weekend	-	2,383	2,383	n/a
12	-	15,913	15,913	n/a
<b>Contracted</b>	<b>31,049</b>	<b>38,726</b>	<b>7,677</b>	<b>24.7%</b>
<b>Total Fixed Route</b>	<b>683,035</b>	<b>605,437</b>	<b>(77,597)</b>	<b>-11.4%</b>
<b>Access</b>	<b>161,473</b>	<b>152,475</b>	<b>(8,998)</b>	<b>-5.6%</b>
<b>Access</b>	<b>161,473</b>	<b>152,475</b>	<b>(8,998)</b>	<b>-5.6%</b>
<b>System-wide</b>	<b>844,507</b>	<b>757,913</b>	<b>(86,595)</b>	<b>-10.3%</b>

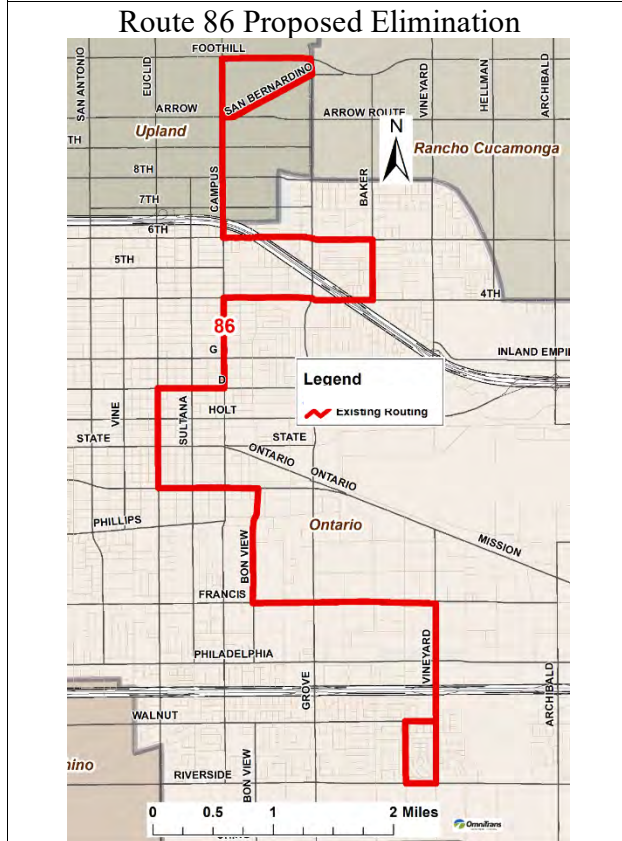
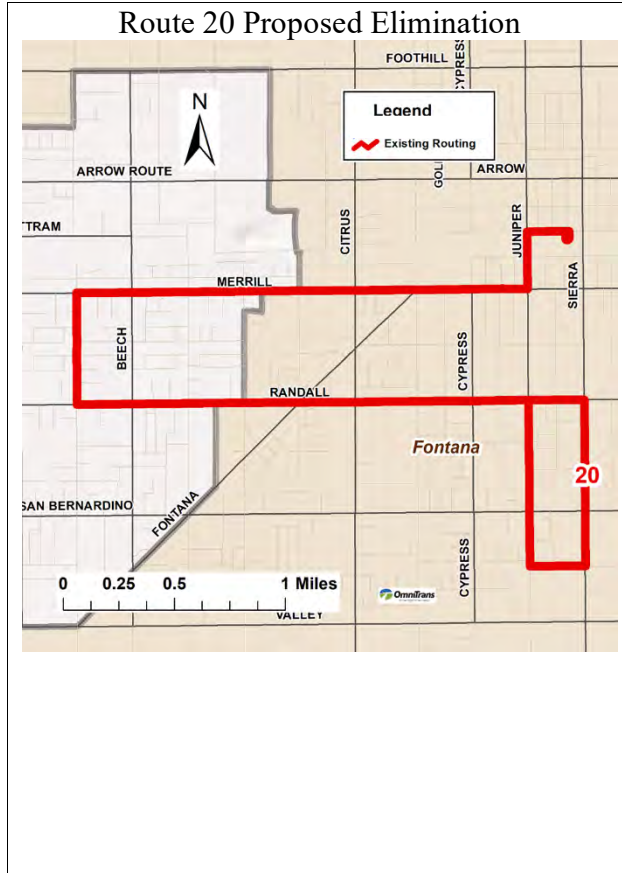
## 4.1 ROUTE ELIMINATIONS

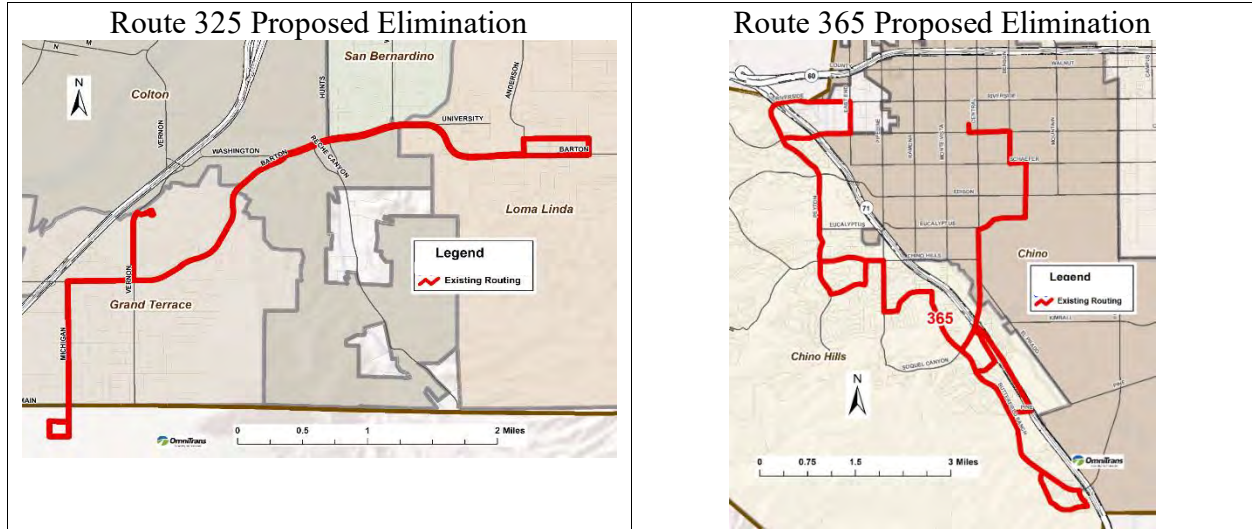
The ConnectForward Plan proposes elimination of eight route numbers as can be seen in Exhibit 11. In each of these route eliminations, the majority of the route is still covered by an alternative routing shown as either a new route or a map change, as shown in sections 4.3 and 4.4. The maps of the eliminated routes can be seen below.

**Exhibit 11: Route Elimination Proposals**

Route	Area Served	Alternate
5	San Bernardino	Partially covered by Route 1 and new Routes 6 and 305
7	San Bernardino	Partially covered by new Route 6
20	Fontana, Unincorporated County	Partially covered by change to Route 82
80	Rancho Cucamonga, Ontario	Majority covered by new Route 87
86	Upland and Ontario	Majority covered by new Route 87
308	Yucaipa	Covered by alternate direction loop route 309
325	Grand Terrace	Barton Corridor covered by new Route 305
365	Chino Hills	Service area to be covered by MicroTransit and High School Tripper service







### 4.2 FREQUENCY CHANGES

The ConnectForward Plan proposes frequency changes on 11 routes. A frequency change, also called a headway change, means that while the route still exists the bus comes less often. For instance, a 30-minute route today may be reduced to an hourly route. These proposals were based on the passengers per hour and load factor analysis described in Section 3.

**Exhibit 12: Frequency Change Proposals**

Route	Days	Area Served	Change
2	All	San Bernardino, Loma Linda	30/60 minutes to 70/75 minutes
3	Weekend	San Bernardino, Highland	20 minutes to 22/25 minutes
4	Weekend	San Bernardino, Highland	20 minutes to 22/25 minutes
8	Weekday	San Bernardino, Loma Linda, Redlands, Yucaipa	30/60 minutes to 35/60/70 minutes (peak frequency between SBTC and VA Ambulatory Clinic)
14	Weekend	San Bernardino, Rialto, Fontana	15 minutes to 20 minutes
22	Weekday	Rialto, Colton	30 minutes full route to 30 minute short (ARMC to Baseline) and 60 minutes north of Baseline
61	Weekend	Fontana, Rancho Cucamonga, Ontario, Montclair, Pomona	15 minutes to 20 minutes
66	Weekday	Fontana, Rancho Cucamonga, Montclair	15 minutes to 20 minutes
290	Weekday	San Bernardino, Colton, Ontario, Montclair	Eliminate midday trips
309	Weekday Weekend	Yucaipa	30 minutes to 60 minutes Eliminated
310	Weekday	Yucaipa	30 minutes to 60 minutes Renamed 319

Based on feedback from the public and stakeholders, short versions of the Route 8 and Route 22 maintained higher than originally planned frequencies. On the Route 8, the maintained frequency is between the SBTC and the VA Ambulatory clinic during peak travel periods. Similarly, the Route 22 maintains higher peak hour frequency between Arrowhead Regional Medical Center and Baseline Rd.

### 4.3 MAP CHANGES

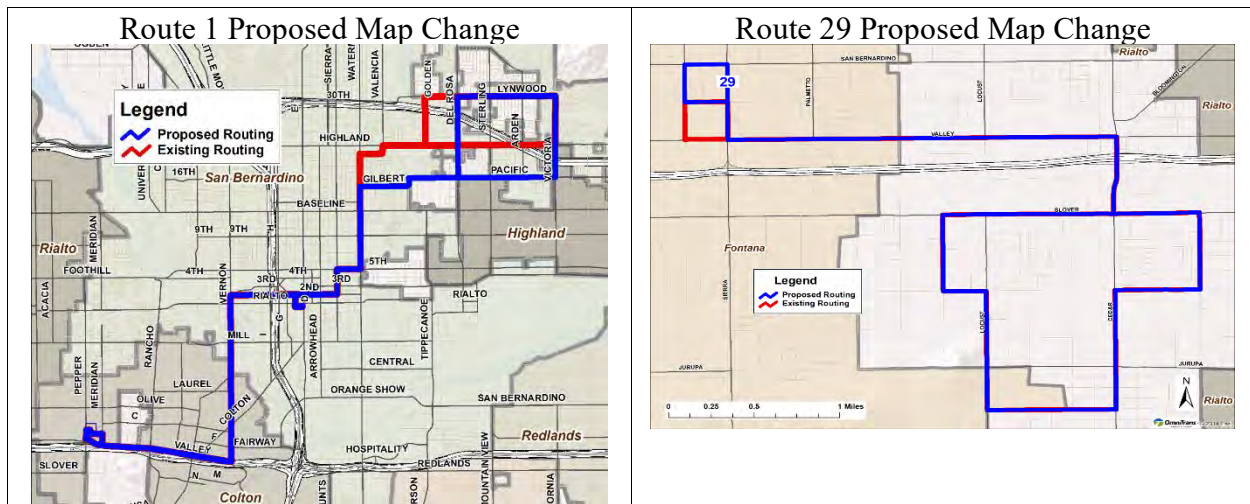
The ConnectForward Plan proposes map changes on six routes. These changes were designed to eliminate service area duplication or to cover areas of relatively strong ridership on routes that were eliminated.

The change to Route 1, provides new service to San Gorgonio High School and increases the service frequency at Pacific High School.

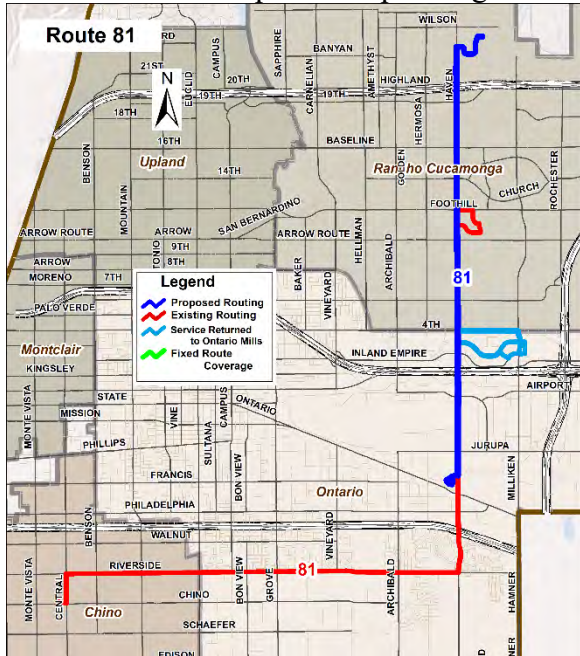
The Route 29 change ensures that there is service at the main entrance of Kaiser Fontana Medical Center to cover the stop that was previously covered by Route 82.

The Route 81 change provides a new transit connection at the East Ontario Metrolink station. Initially the Route 81 was going to travel north/south on Haven Ave. without deviating to Ontario Mills. Following public input and development of detailed schedule development, it was determined that there was time available on the route to maintain service on Route 81 to Ontario Mills.

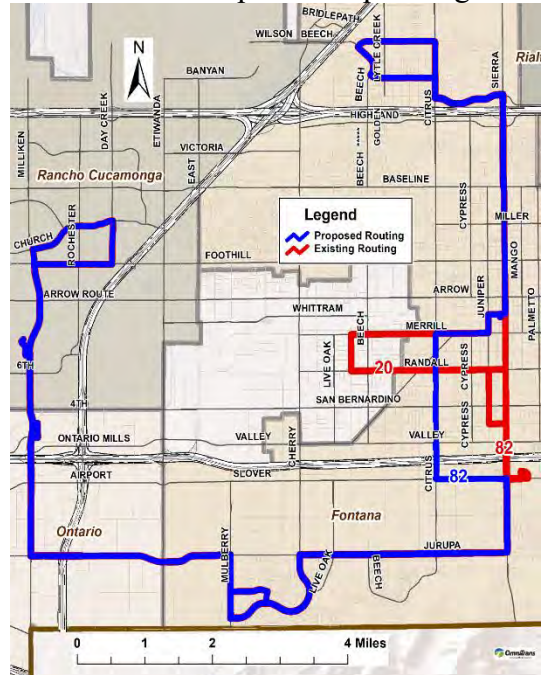
The Route 83 and 84 map changes allow the areas of Upland north of Foothill to be served by a smaller cutaway vehicle instead of a larger transit vehicle. Additionally, the changes ultimately allow for additional service to Montclair (Route 84) and Upland (Route 383) Metrolink stations.



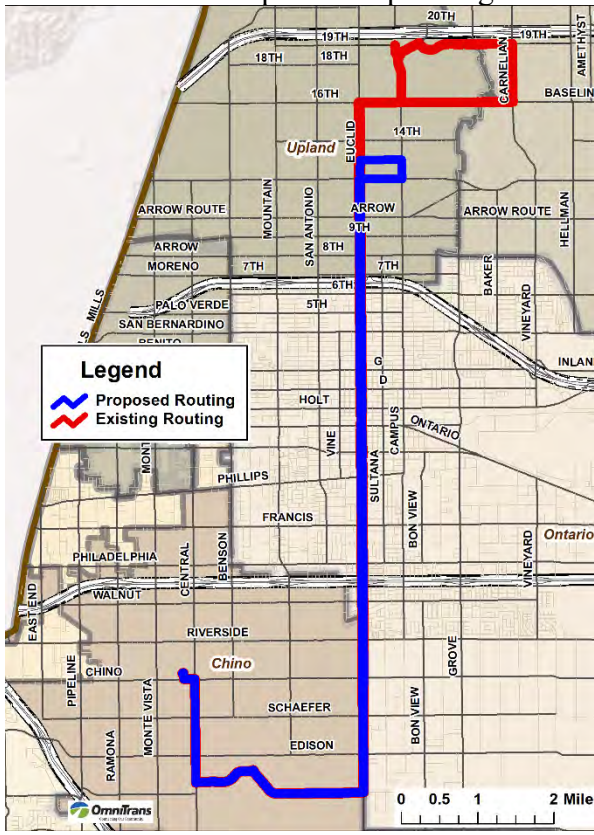
Route 81 Proposed Map Change



Route 82 Proposed Map Change



Route 83 Proposed Map Change



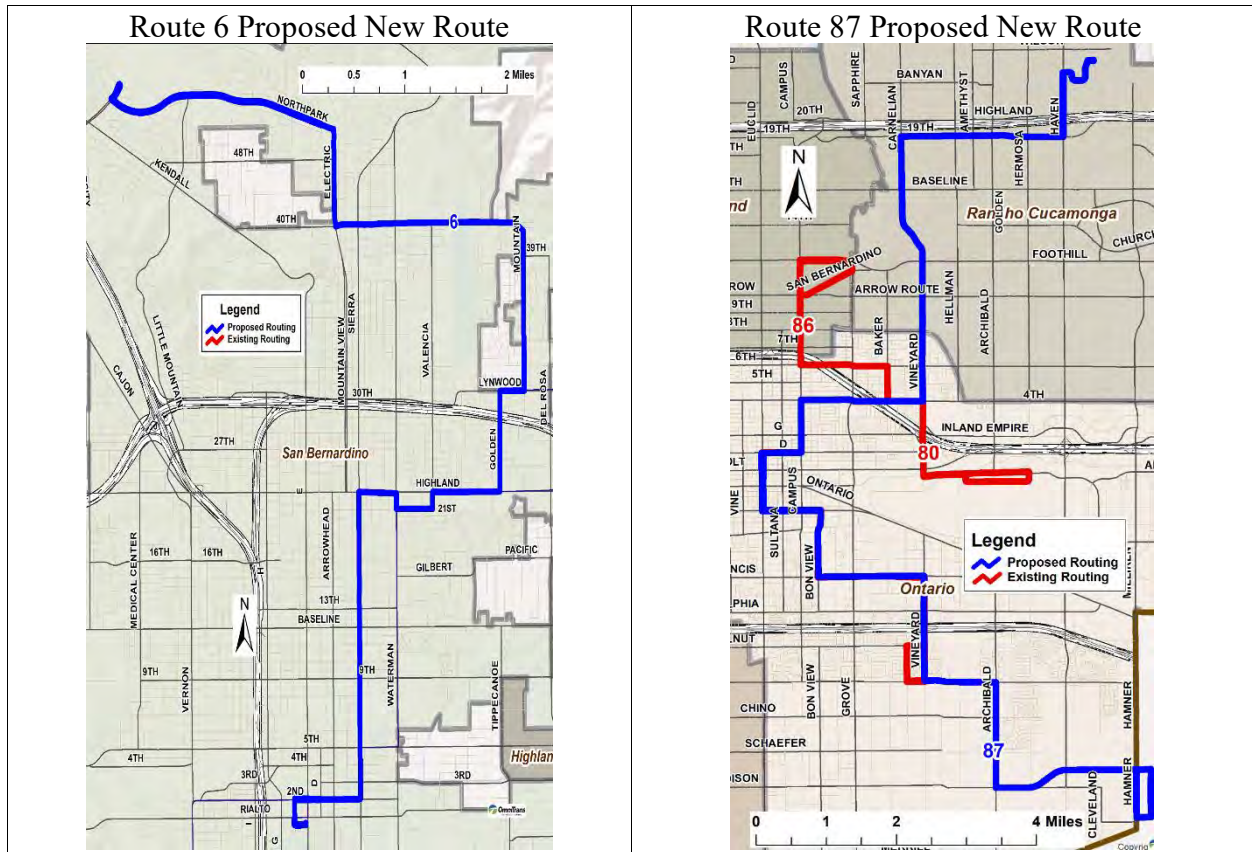
Route 84 Map Change Elimination

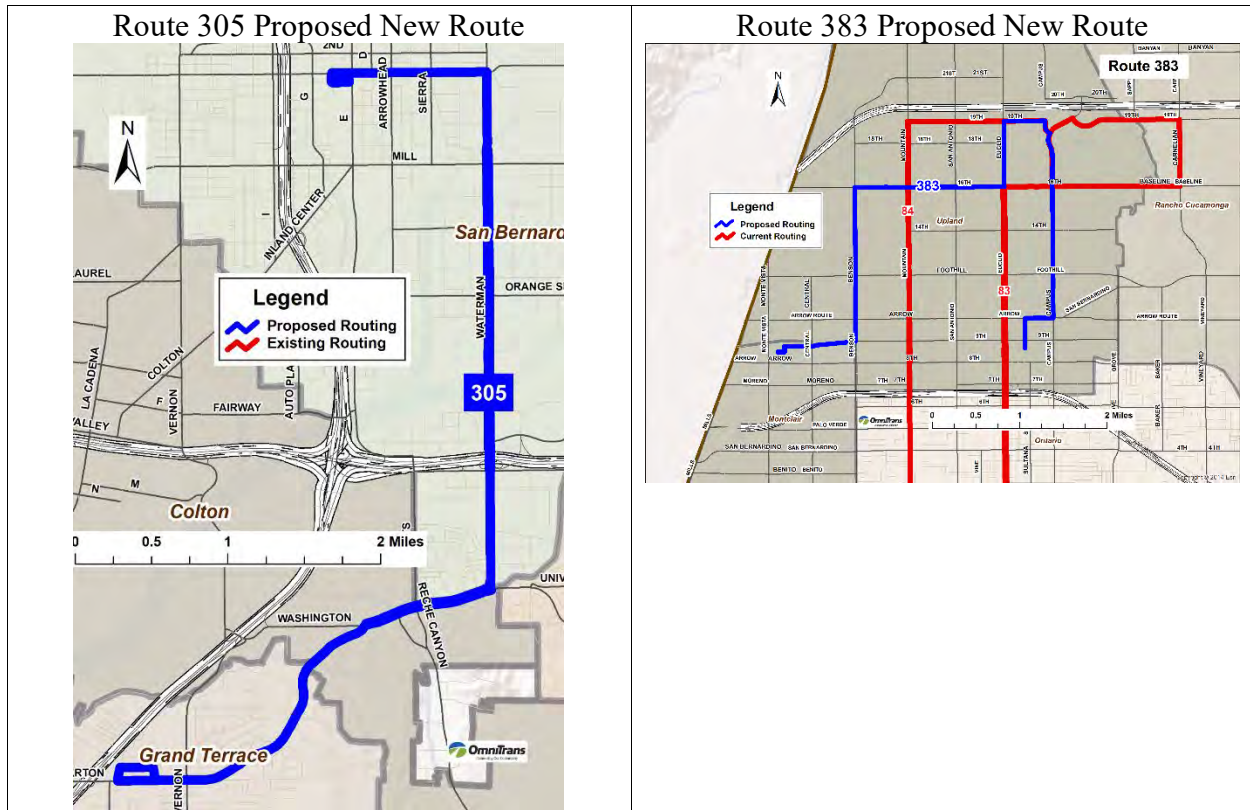


## 4.4 NEW ROUTES

The ConnectForward Plan proposes four new routes. Two of these routes (6 and 87) are direct combinations of the higher performing sections of other routes. Route 6 is a combination of existing but proposed elimination of Routes 5 and 7. These two routes, and the new Route 6 primarily serve North San Bernardino. Route 87 is a new combination of existing but eliminated Routes 80 and 86. This route will create a new cross county connection between San Bernardino County and Riverside County at the Ontario/Eastvale city limits.

The other two new routes (305 and 383) shift service from directly operated 40-foot bus service to contracted smaller bus service along lower performing parts of existing routes. The 305 serves South Waterman Ave. and Barton Ave. in San Bernardino, Colton and Grand Terrace. The 383 primarily serves north Upland and adds service to the Upland Metrolink station.





### 4.5 NEW SERVICES

Omnitrans proposes implementing a pilot MicroTransit service primarily in the City of Chino Hills to replace OmniGo Chino Hills Route 365. MicroTransit is a real-time customer requested, technology-enabled, automatically dispatched demand responsive service. Omnitrans Marketing & Communications team will develop branding for the MicroTransit service prior to launch.

Omnitrans is partnering with First Transit to provide the vehicles and drivers for the MicroTransit Service as was awarded by the Omnitrans Board of Directors in March 2020. First subcontracted with technology provider RideCo for the MicroTransit platform including the customer app, automated dispatching software and payment processing.

**Exhibit 13: Omnitrans' MicroTransit Partners**



RideCo has partnered on some of the most successful MicroTransit projects in the United States when measured by cost effectiveness and passengers per hour. RideCo has implemented large transit partnerships in: San Antonio, TX with VIA Transit; Los Angeles, CA with LA Metro; and in Calgary, Canada with Calgary Transit. Additionally, RideCo has partnered with numerous cities, employers and airports to provide MicroTransit technology.

Building on RideCo's experience as well as public and stakeholder input, Omnitrans' initial MicroTransit proposal for Chino Hills has been modified from what was originally proposed at



the public hearings. As shown in Exhibit 14, RideCo completed a simulation of probable trip patterns. Based on this simulation and underlying population and employment density in the area, RideCo strongly recommended extending the MicroTransit service area to include the Chino Transit Center and a major employment area of the City of Chino. This area in Chino is approximately bordered by Chino Ave. on the North, Oaks Ave. and Central on the East and the Chino/Chino Hills city limit on the West and South.

**Exhibit 14: RideCo Peak Period Trip Simulation and Recommended Service Area**

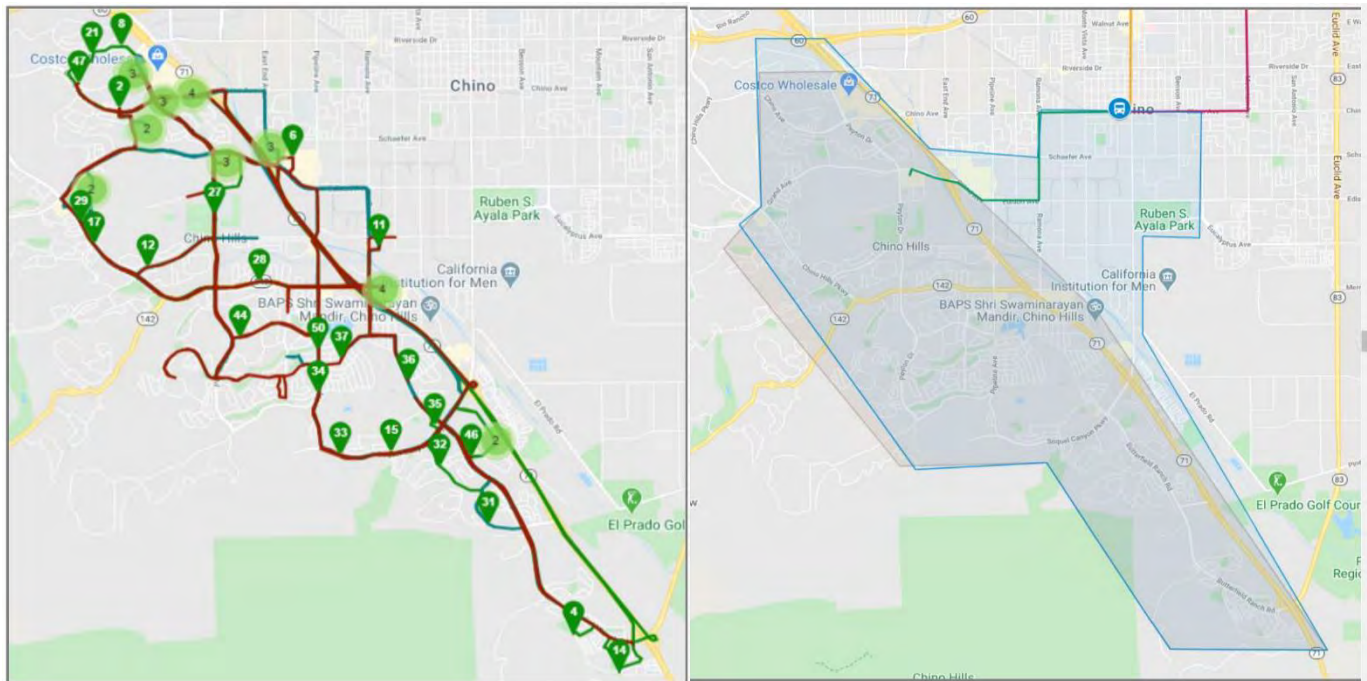


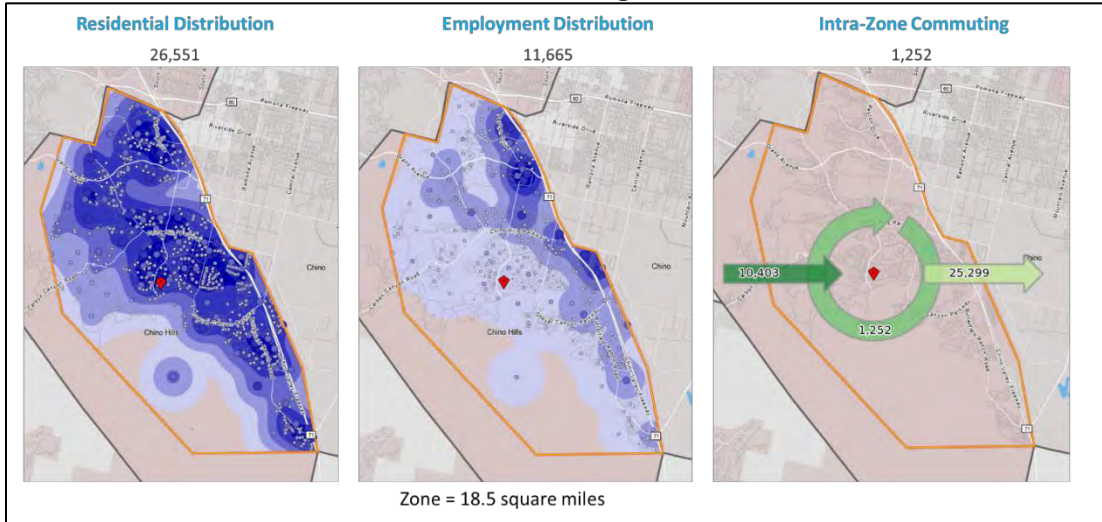
Exhibit 15 and Exhibit 19 show residential household distribution, employment distribution and travel patterns for the initial proposal and the refined proposal. The result shows that the refined proposal was able to increase the amount of households covered by 30%, employment by 205% and intra-zone commuting by 130%. The trip modeling showed that these increases can be accomplished with the same number of shuttles and maintain a goal of less than 15-minute average wait time once trips are requested compared to a 60-minute frequency on Route 365. As a result, Omnitrans proposed implementing the refined MicroTransit zone shown in Exhibit 14.

The RideCo MicroTransit platform is based on a virtual stop model. This means that general public trips will not be dispatched to someone’s house, but to a virtual stop at the closest intersection. The app can recommend the intersection or offer choices in travel time and pickup time between multiple intersection based on currently scheduled trips. In this way, RideCo can help batch shared rides making the MicroTransit service as cost-effective as possible. Major destinations will have immediately adjacent virtual stops at the closest safe location.

Since the MicroTransit service will also cover ADA paratransit trips in the region, ADA riders can be appropriately coded within the RideCo platform and offered riders without need to travel to the closest intersection.

Attachment: City of Chino Appeal Request Form and Supporting Documentation (Appeal of the Draft RHNA Allocation for the City of Chino)

**Exhibit 15: Initial MicroTransit Proposed Zone: Residential and Employment distribution and Intra-Zone Commuting**



**Exhibit 16: Refined MicroTransit Proposed Zone: Residential and Employment distribution and Intra-Zone Commuting**

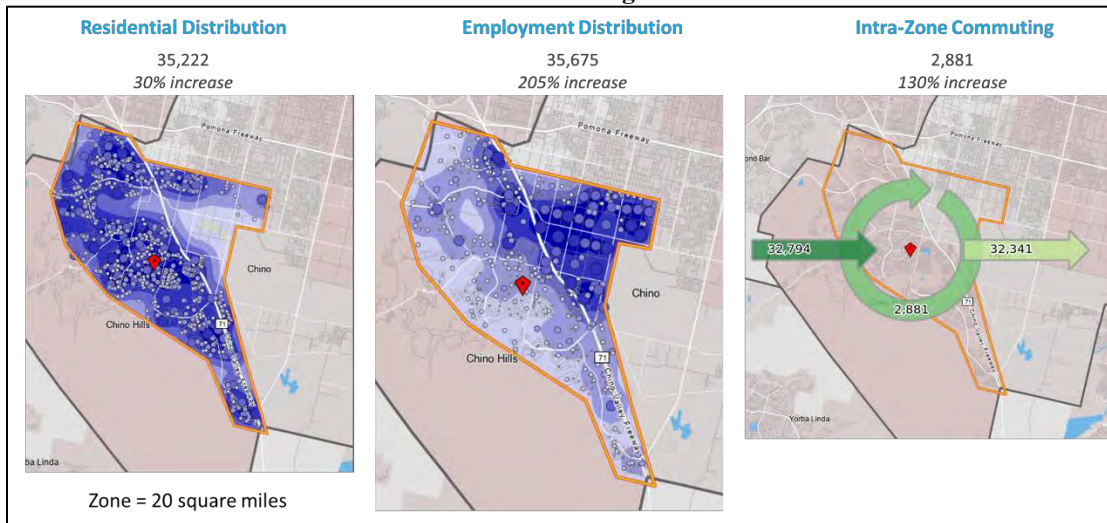


Exhibit 17 shows the key service characteristics for the Chino Hills Pilot MicroTransit service.

**Exhibit 17: Chino Hills MicroTransit Key Service Characteristics**

<b>Service Days</b>	Monday-Friday
<b>Service Hours</b>	6:00am-8:00pm
<b>Annual Revenue Hours</b>	10,752
<b>Annual Direct Purchased Transportation Costs</b>	\$750,000
<b>Average Weekday Ridership</b>	200 (51,000 per year)
<b>Fares: Full Fare/Discounted includes a day pass that can be used on fixed route only</b>	\$4.00 full fare/\$2 S/D/Vet
<b>Expected Average Wait Time</b>	<15 minutes
<b>Expected Average Travel Time</b>	<15 minutes
<b>Expected share of shared rides</b>	>75%

#### 4.6 CONTRACTING SERVICE

Based on route-level ridership patterns and smaller cutaway vehicles being freed up because of declining OmniAccess ridership levels, Omnitrans proposes to operate additional fixed route service using smaller cutaway vehicles. These cutaways would be operated by the same contractor that operates OmniAccess and OmniGo. When the purchased transportation contract was awarded to First Transit in March 2020, the option to add additional fixed route service was included in the contract.

Omnitrans proposes increasing the use of smaller vehicles with contracted service on weekends. Weekend service is ideal for contracting out because ridership is lower on weekends and more appropriate for a smaller vehicle and the use of OmniAccess vehicles is significantly lower on weekends. As a result, Omnitrans proposes to operate contracted service on weekend Routes 12, 84 and 88. (Note: Route 12 has been contracted out due to low ridership during the COVID-19 pandemic on both weekends and weekdays, and is now proposed to remain contracted out as part of the FY2021 service plan).

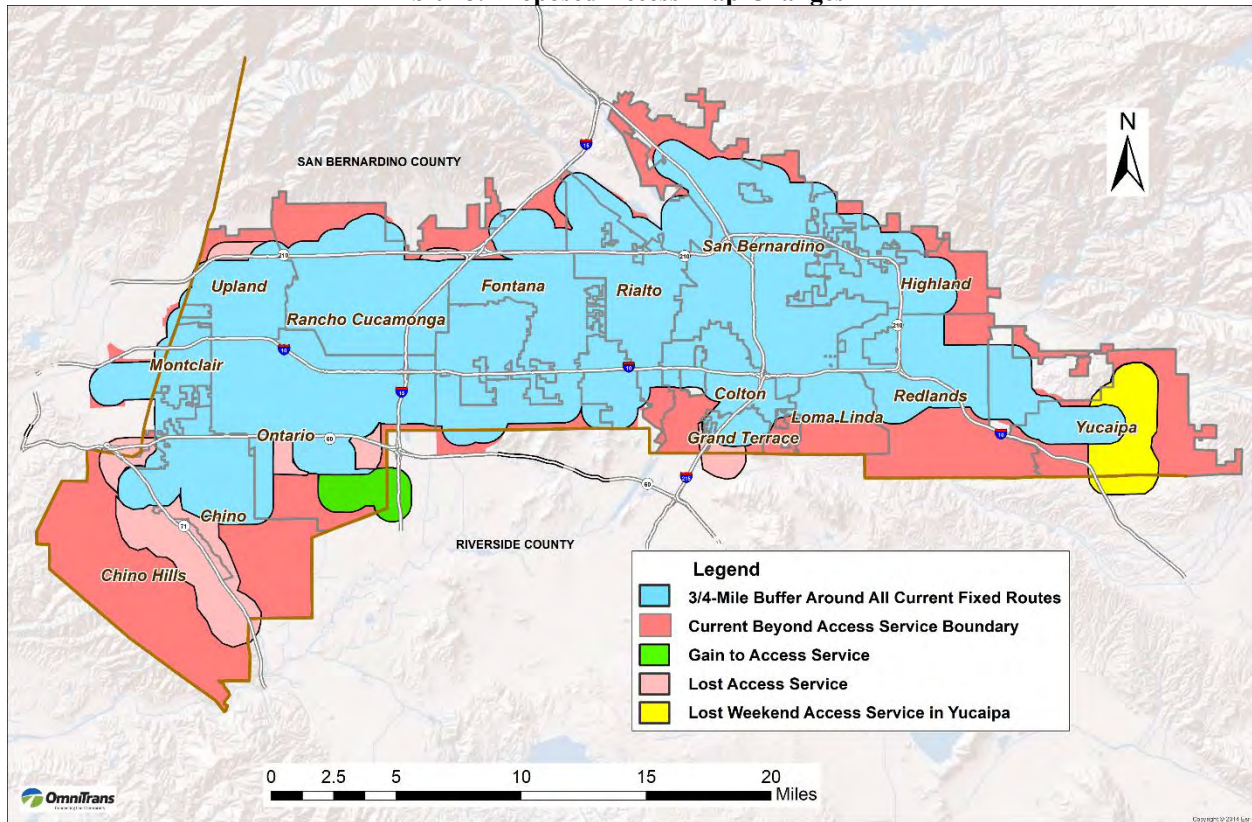
Omnitrans currently contracts out weekend service on Route 29, primarily in Bloomington. This has been successful for Omnitrans since it was implemented in 2010. As a result, Omnitrans proposes to fully contract out Route 29 starting in September 2020.

#### 4.7 ACCESS MAP CHANGES

Access service is the most expensive and most subsidized service that Omnitrans offers. OmniAccess ridership accounts for approximately 3% of systemwide ridership, but more than 17% of systemwide operating costs. OmniAccess service is mandated by the ADA, which requires that paratransit service be offered within  $\frac{3}{4}$ -miles and during the same days and hours of fixed route service. Since OmniAccess is an expensive and mandated service, the ConnectForward Plan recommends that Omnitrans provide the service in a manner that is specifically mandated by ADA regulations.

The blue area shown in Exhibit 18 is the  $\frac{3}{4}$ -mile service area required based on the proposed fixed route changes described above. The light pink areas are areas that are currently mandated but would no longer be mandated based on the fixed route service changes described above. The small green area is a new mandated area that OmniAccess would need to cover based on the new Route 87 connection to Eastvale. The dark pink area represents areas that are currently and will continue to be beyond the boundary or beyond the mandate and hence proposed for elimination. Lastly, the area in yellow currently has service seven days a week but would have weekday only service based on the fixed route service changes. Riders in these areas have been contacted and provided information about these other options they may be able to use through the Special Transportation Services Department.

**Exhibit 18: Proposed Access Map Changes**



### 4.8 ACCESS POLICY CHANGES

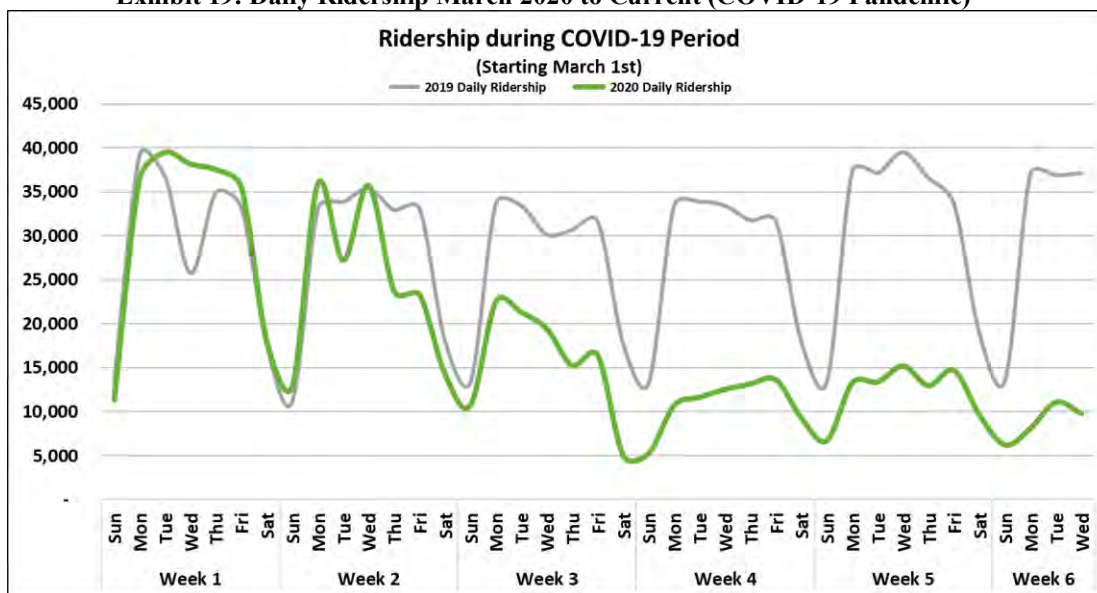
In addition to map changes, the ConnectForward plan proposes a change to the advanced reservation policy for OmniAccess. Currently, OmniAccess riders can make a reservation between one and seven days ahead of the travel day. The proposed reservation window will reduce this call-in window to three days ahead of the travel day. The goal of this change is to reduce the number of cancellations and no shows which have an estimated cost of over \$300,000 per year. Currently, 65% of the no shows and late cancellations are from riders that schedule their trip more than three days in advance, who account for only 21% of the trips scheduled. Additionally, Omnitrans has implemented a program called PASS-Web which allows OmniAccess riders to schedule trips online, making this change to the call-in window less impactful since reservations can be made through multiple channels.

**5. CORONAVIRUS SERVICE CHANGES AND SCALABLE SERVICE CHANGES**

In January 2020, the first cases in what became the COVID-19 Pandemic were diagnosed in the US. Approximately two months later, California Governor Newsom issued a statewide Stay at Home Order. The pandemic and subsequent Stay at Home Order significantly changed life in California, including travel and transit patterns.

Through the end of February, Omnitrans systemwide ridership was up 1.8% compared to the year before. FY2020 was on pace to be the first positive ridership year since FY2012. Following the Stay at Home Order, Omnitrans ridership fell 65% compared to the prior year and remained at that level from mid-March through the writing of this report in mid-April. This ridership trend can be seen in Exhibit 19.

**Exhibit 19: Daily Ridership March 2020 to Current (COVID-19 Pandemic)**



In response to the pandemic, the Stay at Home Order, and the resulting decline in ridership, Omnitrans implemented its Emergency Service Deployment Plan. This plan has seven service levels ranging from Level 1, status quo 100% of regular service, to Level 7, which is approximately a 70% decline in service.

Omnitrans initially implemented Emergency Service Level 3 on March 23<sup>rd</sup> which reduced service by approximately 35% through frequency reductions. Routes that operated every 10-, 15- or 20-minutes were reduced to 30-minutes and routes that operated every 30-minutes were reduced to hourly. This kept every Omnitrans route in service in order to provide lifeline coverage service throughout Omnitrans’ service area. This also implemented seven of the eleven frequency reductions initially planned for September 2020 as described in Section 3 of this report.

As ridership continued to decline and the data began to show that routes which primarily served schools were seeing the largest decline, it was clear that further reductions were required. On April 13th, Omnitrans implemented further targeted frequency reductions, route eliminations and

contracted out more routes to use smaller vehicles. This increased the service reduction from approximately 35% to 45%.

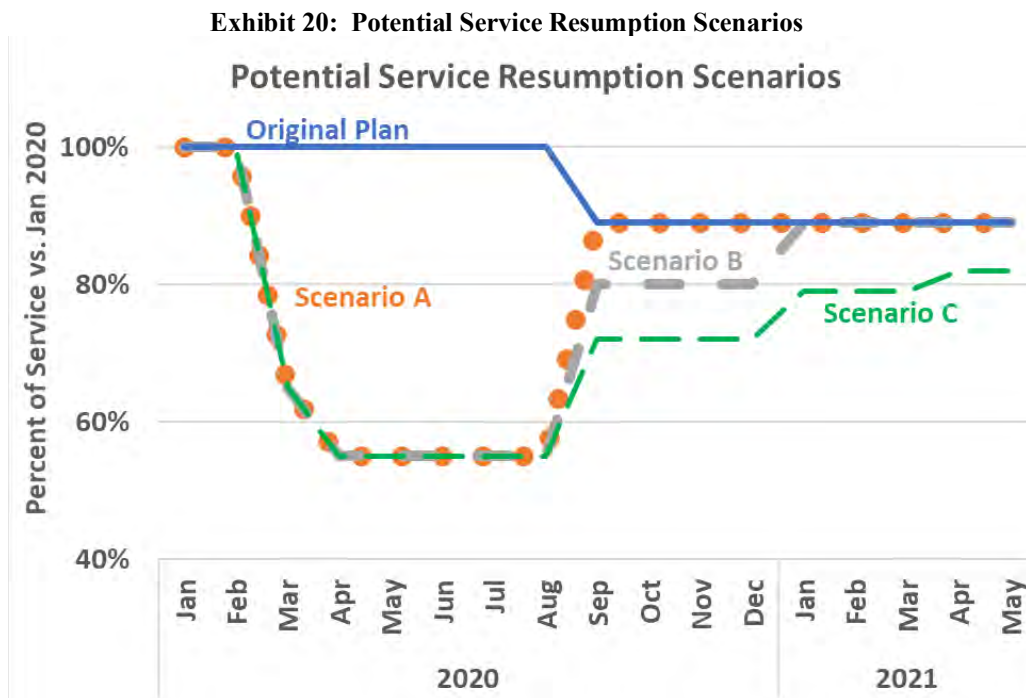
These April 13<sup>th</sup> service changes also implemented some of the planned September service changes ahead of schedule. These included:

- Elimination of Route 7 (northern San Bernardino),
- Elimination of Route 20 (Fontana),
- Elimination of Route 308 (Yucaipa),
- Contracting out of Route 12 (San Bernardino, Muscoy, Rialto, Fontana), and,
- Contracting out of Route 29 (Bloomington).

There were additional changes that occurred at this period as well, however, these are currently planned to be temporary changes that will return following the pandemic.

The implementation of the Emergency Service Deployment plan now has Omnitrans operating service well below the planned September 2020 service plan. Additionally, with the decline in ridership and resulting fare revenue and the state of the economy and resulting financial uncertainty, there is a high degree of uncertainty about how and when service levels will be resumed to planned levels. As a result, Omnitrans believes it prudent to consider flexible and scalable scenarios to return service to the planned September service levels or possibly to a level below the initially plan September service level.

Exhibit 20 shows possible service resumption scenarios. The Original Plan Blue Line shows the initially planned service starting at 100% in early 2020 and declining to 89% in September 2020 with the planned 11% service reduction. Scenarios A, B and C all show the enacted Emergency



Service reductions through April 2020. Omnitrans currently assumes that these reduced levels will continue through the end of the summer. Even if the Stay at Home Order is lifted, Omnitrans will likely continue to run reduced service through the summer as ridership will likely not rebound quickly and summer ridership is typically 10%-15% below other months.

Schools, colleges, and universities reopening for normal activities will likely be the trigger for beginning to restore service. As this occurs, Omnitrans will need to decide if service should jump to the planned September service level as shown in Scenario A or take a staggered approach to the September service level as shown in the Scenario B, with service resumption in January 2021. Alternatively, in Scenario C, service is resumed in smaller segments, but does not reach the planned September service levels as Omnitrans may need to further reduce service due to economic conditions.

This Service Plan is still based on the Original Plan in Exhibit 20. Costs associated with lost fare revenue are eligible expenses in the federal CARES Act. However, Omnitrans fully plans to monitor ridership, community activity, and economic conditions and will choose a service resumption path that aligns with the conditions. If Omnitrans continues to operate below plan and adjusts staffing levels accordingly, each scenario offers different potential savings opportunities in FY2021. Scenario A would save approximately \$3.5 million in FY2021, compared to the original plan. The Scenario B would save approximately \$5.0 million and Scenario C would save approximately \$8.5 million during the year. The specific service reductions to achieve these levels has not been determined. This type of scalable adjustment as Omnitrans moves towards planned service levels will allow Omnitrans to meet budget requirements even during uncertain times.

Omnitrans will bring regular monthly reports on budget, service and ridership levels to the Administrative and Finance Committee. During these reports, the Committee will be given staff recommendations on the service resumption plan which the Committee can recommend moving to the full Board of Directors. Additionally, the development and implementation of the Business Resumption Plan will be an action item in the FY2021 Management Plan.

## 6. PROPOSED FY2021 SERVICE LEVELS

This section provides FY2021 projections for key service characteristics at systemwide, fixed route and ADA paratransit services levels. As described in Section 5, there are multiple factors and possible scenarios to consider as the nation rebounds from the COVID-19 pandemic. The forecasts in this section were developed prior to the pandemic and correspond to the blue line shown in Exhibit 20. Keeping these forecasts at the original projections will help document changes compared to planned service and fare revenue in response to the pandemic.

Omnitrans has already implemented the Emergency Service Deployment Plan bringing FY2020 Fourth Quarter service levels down by approximately 45% compared to plan. Since service levels are already reduced below the planned September 2020 (FY2021) levels, Omnitrans will have the opportunity to return service in a flexible and scalable way based on ridership levels, workforce availability and economic/financial conditions. The Board will be kept apprised of changes in ridership, revenues/costs and workforce levels on a monthly basis in order to determine how and when service levels are increased.

### 6.1 SYSTEMWIDE SERVICE

Systemwide service characteristics are the summation of the fixed route and OmniAccess service characteristics provided in the sections below. Traditional fixed route service dominates systemwide service characteristics because 71% of Omnitrans' FY2021 revenue hours are directly operated 40-foot bus service, compared to 6% for sbX, 3% for OmniGo contracted fixed route service, and 20% for ADA paratransit service. From a ridership perspective, traditional fixed route service dominates the service characteristics by an even larger share accounting for 88% of boardings compared to 8% for sbX, 1% for OmniGo and 3% for OmniAccess.

Exhibit 21 shows that Omnitrans' revenue hours are projected to decline 8.7% during FY2021, falling from 843,000 hours in FY2020 to 770,000 in FY2021. This is a total decline of 73,000 revenue hours during the year as a result of the service changes proposed in Section 4 of this report. Revenue miles see a similar decline of 8.2% also driven by the proposed service changes. Ridership levels are projected to decline 3.5% during the year, equivalent to approximately 382,000 boardings. Fare revenue is projected to decline 1.8% as the Fiscal Year still see positive fare impacts from the full year implementation of the September 2019 fare increase.

**Exhibit 21: System-wide Service Characteristics Summary**

System Total (In Thousands except vehicles and ratios)		Actuals				Year-End Estimate	Projection	Percent Change
		FY2016	FY2017	FY2018	FY2019	FY2020	FY2021	FY2021
<b>Financial</b>	<b>Fare Revenue</b>	\$ 14,193	\$ 13,314	\$ 13,078	\$ 13,595	\$ 14,863	\$ 14,597	-1.8%
<b>Operating Data</b>	<b>Revenue Miles</b>	11,320	11,389	11,415	11,425	11,609	10,662	-8.2%
	<b>Total Miles</b>	12,741	12,742	12,805	12,818	12,902	11,838	-8.2%
	<b>Revenue Hours</b>	831	832	830	833	843	770	-8.7%
	<b>Total Hours</b>	900	897	898	898	915	835	-8.6%
	<b>Passengers</b>	12,813	11,653	11,210	10,864	11,059	10,676	-3.5%
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>	248	250	251	251	250	250	0.0%
	<b>Spare Fleet</b>	32	31	31	32	34	34	0.0%
	<b>Total Fleet</b>	278	281	282	283	284	284	0.0%
<b>Key Stats</b>	<b>Passengers per Hour</b>	15.4	14.0	13.5	13.0	13.1	13.9	5.7%



Omnitrans' total fleet is projected to remain unchanged at 284 vehicles, including articulated coaches, 40-foot coaches and Access cutaways. This projection is for maximum vehicles during the year, which includes the planned service prior to the September 2020 service changes. The number of total vehicles will fall by nineteen 40-foot coaches following the implementation of the September service changes.

## 6.2 FIXED ROUTE SERVICE

The service changes described in Section 4 of this report drive the proposed fixed route service changes shown in Exhibit 22. Section 4 describes an annualized change in total revenue hours of 11.4% and 77,597 revenue hours. The projection for FY2021 in Exhibit 22 shows a 9.4% decline, or a decline of 64,000 revenue hours. The difference between the two estimates is that the FY2021 estimates have the service reduction in place for 10 of the 12 months of FY2021, while the projections in Section 4 are fully annualized figures.

Fixed route fare revenue is projected to decline 1.9%, to \$13.2 million while ridership is projected to decline 3.5% to 10.3 million riders, down 379,000 riders from the initial year-end estimate of 10.7 million riders for FY2020.

**Exhibit 22: Total Fixed Route Service Characteristics Summary**

Total Fixed Route (In Thousands except vehicles and ratios)		Actuals				Year-End Estimate	Projection	Percent Change
		FY2016	FY2017	FY2018	FY2019	FY2020	FY2021	FY2021
Financial	Fare Revenue	\$ 12,439	\$ 11,577	\$ 11,463	\$ 12,150	\$ 13,416	\$ 13,155	-1.9%
	Revenue Miles	8,733	8,833	8,985	9,111	9,201	8,388	-8.8%
Operating Data	Total Miles	9,452	9,568	9,769	9,917	9,991	9,089	-9.0%
	Revenue Hours	661	665	673	676	682	618	-9.4%
	Total Hours	691	697	705	709	714	646	-9.5%
	Passengers	12,380	11,220	10,832	10,503	10,728	10,349	-3.5%
Fleet Data	Peak Revenue Fleet	152	154	155	155	154	154	0.0%
	Spare Fleet	32	31	31	32	34	34	0.0%
	Total Fleet	182	185	186	187	188	188	0.0%
Key Stats	Passengers per Hour	18.7	16.9	16.1	15.5	15.7	16.8	6.5%

The peak fleet utilized during the year will remain at 154 vehicles as the service change does not occur until September. Following the September service change, the peak fixed route fleet will decline to 138 vehicles including cutaways, coaches and articulated buses.

In order to quantify the impact of the COVID-19 pandemic, the initial year-end estimate shown in Exhibit 22 is compared to a newly revised forecast shown in Exhibit 23 based on: 1) Maintaining reduced service through the end of the fiscal year, 2) social distancing guideline remain in place through the end of the fiscal year, which has Omnitrans maintain rear door boarding only, with no fare collection, and, 3) average daily ridership trends from late March/early April continue to the end of the fiscal year.

**Exhibit 23: FY2020 Initial vs. Revised Forecast  
(COVID-19 Impact)**

Total Fixed Route (in Thousands except vehicles and ratios)		FY2020 Estimates			
		Initial	Revised	Δ	%Δ
Financial Data	Fare Revenue	\$ 13,416	\$ 9,754	\$ (3,662)	-27.3%
	Revenue Miles	9,201	8,155	(1,046)	-11.4%
Operating Data	Total Miles	9,991	8,855	(1,136)	-11.4%
	Revenue Hours	682	604	(78)	-11.4%
	Total Hours	714	633	(81)	-11.4%
	Passengers	10,728	8,704	(2,024)	-18.9%
Fleet Data	Peak Revenue Fleet*	154	92	(62)	-40.3%
Key Stats	Passengers per Hour	15.7	14.4	(1.3)	-8.5%

\*Estimated peak fleet at end of year including cutaways, 40' buses and articulated buses

### 6.3 OMNIACCESS SERVICE – ADA PARATRANSIT SERVICE

Over the last several years, Omnitrans’ Special Transit Service Department has implemented several programs which have mitigated growth on Access, including travel training, Regional Mobility Partnerships (RMP), volunteer driver programs, and RideLyft/Taxi partnerships. This decline has not been a regional nor national trend, and as such, Omnitrans does not project ridership declines to continue from these programs.

However, OmniAccess ridership forecasts are also impacted by the elimination of the Beyond the Boundary service, map changes associated with the proposed fixed route service changes, and changes to the reservation window. Additionally, July 1, 2020 is the contractor transition to operate OmniAccess service. The new contractor, First Transit, has proposed several efficiencies that if implemented will increase productivity measured by passengers per hour.

As a result of the above-mentioned factors, OmniAccess ridership is projected to decline 1.0%, from 331,000 passengers in FY2020 to 328,000 riders in FY2021. Declining ridership on OmniAccess often helps the agency save operating costs, as OmniAccess trips are the most expensive service offering at the agency, typically costing seven times as much per trip as a comparable trip on fixed route service.

Since service characteristics such as revenue hours and revenue miles on OmniAccess are demand-driven and determined by ridership levels, Access’ service characteristics follow the ridership trend. Revenue hours and miles are expected to decline by 5.6% at 2,274,000 revenue miles and 152,000 revenue hours during FY2021. Exhibit 24 below shows the estimated service characteristics for OmniAccess during FY2021.

**Exhibit 24: Access Service Characteristics Summary**

Access (In Thousands except vehicles and ratios)		Actuals				Year-End Estimate	Projection	Percent Change
		FY2016	FY2017	FY2018	FY2019	FY2020	FY2021	FY2021
<b>Financial</b>	<b>Fare Revenue</b>	\$ 1,754	\$ 1,736	\$ 1,614	\$ 1,445	\$ 1,447	\$ 1,442	-0.3%
<b>Operating Data</b>	<b>Revenue Miles</b>	2,587	2,556	2,431	2,314	2,408	2,274	-5.6%
	<b>Total Miles</b>	3,290	3,174	3,036	2,901	2,911	2,749	-5.6%
	<b>Revenue Hours</b>	170	167	158	157	161	152	-5.6%
	<b>Total Hours</b>	209	200	193	189	201	190	-5.6%
	<b>Passengers</b>	434	432	378	360	331	328	-1.0%
<b>Fleet Data</b>	<b>Peak Revenue Fleet</b>	96	96	96	96	96	96	0.0%
	<b>Spare Fleet</b>	-	-	-	-	-	-	0.0%
	<b>Total Fleet</b>	96	96	96	96	96	96	0.0%
<b>Key Stats</b>	<b>Passengers per Hour</b>	2.5	2.6	2.4	2.3	2.1	2.2	4.8%

## 7. FARE STRUCTURE

Omnitrans raised fares in FY2020 and proposes no fare change during FY2021. Exhibit 25, Exhibit 26 and Exhibit 27 provide details of Omnitrans' FY2021 fare structure.

**Exhibit 25: Fixed Route Fares**

	Full-Fare	Senior/Disability/Medicare	Youth	Veteran
<b>31-Day</b>	\$ 60.00	\$ 30.00	\$ 45.00	\$ 30.00
<b>7-Day</b>	\$ 20.00	\$ 9.00	\$ 15.00	\$ 9.00
<b>1-Day</b>				
Single Day Pass	\$ 6.00	\$2.75	n/a full-fare	\$ 2.75
Packs of Ten	\$ 54.00	\$ 25.00	n/a full-fare	\$ 25.00
<b>Single Ride</b>				
Individually	\$ 2.00	\$ 0.90	n/a full-fare	\$ 0.90
Packs of Ten	\$ 18.00	\$ 8.50	n/a full-fare	\$ 8.50
<b>Free Rides</b>	<b>MetroLink Transfers:</b> Free to rider; SCRRRA pays one-half base fare for each boarding with a MetroLink ticket/pass; RCTC pays a half base fare for Metrolink transfers on Rt. 215. <b>Children:</b> Height < 46"; limit 2 free per fare paying riders <b>Personal Care Attendant:</b> Accompanying a ADA Rider; <b>Omnitrans Employees and Family Members:</b> With Employee/Family ID; <b>RTA Employees and Family Members:</b> With Employee/Family ID; and, <b>LAMTA, Foothill Transit, OCTA &amp; Pass Transit Employees:</b> With Employee ID <b>Promotional Fares.</b> <b>Uniformed active military, police and fire personnel.</b>			
<b>Go Smart Fare</b>	<ul style="list-style-type: none"> <li>The Go Smart fare is a pre-negotiated fare for any student, employee, member or client of a partner organization. Participants must have an active, valid Omnitrans-compatible ID card as proof of fare.</li> </ul>			

**Exhibit 26: Access Fares**

	Cash	Beyond ADA Boundary
<b>1-3 zone</b>	\$ 3.25	\$ 8.25
<b>4 zone</b>	\$ 4.25	\$ 9.25
<b>5 zone</b>	\$ 5.25	\$ 10.25
<b>6 zone</b>	\$ 6.25	\$ 11.25

**Exhibit 27: MicroTransit Fares**

	Full-Fare	Senior/Disability/Medicare	Youth	Veteran
<b>One-Ride</b> (includes day pass on fixed route)	\$ 4.00	\$ 2.00	\$ 4.00	\$ 2.00

There will be a promotional free ride period at the beginning of MicroTransit service. This may be followed by a short discounted promotional period prior to reaching .

## 8. PUBLIC INPUT AND TITLE VI SERVICE EQUITY ANALYSIS

Best practices in transit planning are built upon thorough public input. Omnitrans staff held public meetings associated with the update of the SRTP. Feedback was also attained during the survey and focus groups associated with the sbX Before and After Study. Additionally, Omnitrans participates in the American Bus Benchmarking Group (ABBG) annual Customer Satisfaction Survey. The Strategic Development Department also tracks and considers all service requests that are received. These inputs inform Omnitrans’ recommendations for service changes.

Federal Transit Administration (FTA) regulations require public hearings and Title VI Service Equity Analyses for any major service change or any fare increase. The FTA requires that agencies define a major service change. Omnitrans has defined this as a change to any route’s hours, miles or passengers by 25% or more on any day of service. Given the totality of the service changes, this service change was deemed a major service change and required a public hearing.

### 8.1 PUBLIC INPUT

In order to maximize the potential for public involvement, Omnitrans held 22 public meetings. There were nine formal public hearings and thirteen informal public meetings. Additional, Omnitrans staff presented at four City Council meetings upon request from each of those four cities.

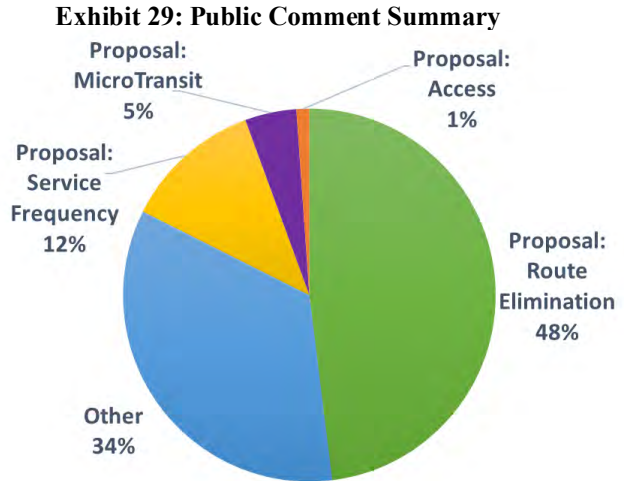
This approach is based on Omnitrans’ Public Outreach Plan, which was adopted by the Board in 2007. Omnitrans has found informal public hearings in the community to be much more successful in generating public participation than a single public hearing held at a Board Meeting. The Public Hearings schedule is shown in Exhibit 28.

**Exhibit 28: Public Meetings**

CITY	LOCATION	DATE	TIME
San Bernardino	San Bernardino Transit Center	Monday, January 13, 2020	6:00 A.M. – 9:00 A.M.
San Bernardino	San Bernardino Transit Center	Monday, January 13, 2020	3:00 P.M. – 6:00 P.M.
*Yucaipa	<b>Yucaipa City Hall</b>	<b>Tuesday, January 14, 2020</b>	<b>3:00 P.M. – 5:00 P.M.</b>
Fontana	Fontana Transit Center	Wednesday, January 15, 2020	6:00 A.M. – 9:00 A.M.
*Upland	<b>Upland City Hall</b>	<b>Wednesday, January 15, 2020</b>	<b>3:00 P.M. – 6:00 P.M.</b>
Fontana	Fontana Transit Center	Thursday, January 16, 2020	3:00 P.M. – 6:00 P.M.
Rialto	Foothill & Riverside Bus Stops	Friday, January 17, 2020	11:00 A.M. – 2:00 P.M.
Montclair	Montclair Transit Center	Tuesday, January 21, 2020	6:00 A.M. – 9:00 A.M.
Chino	Chino Transit Center	Tuesday, January 21, 2020	3:00 P.M. – 6:00 P.M.
*San Bernardino	<b>Plans and Programs Meeting</b>	<b>Wednesday, January 22, 2020</b>	<b>9:00 A.M.</b>
Redlands	Redlands Mall Bus Stops	Thursday, January 23, 2020	3:00 P.M. – 6:00 P.M.
Ontario	Ontario Mills	Friday, January 24, 2020	11:00 A.M. – 2:00 P.M.
*Grand Terrace	<b>Grand Terrace Community Room</b>	<b>Monday, January 27, 2020</b>	<b>3:00 P.M. – 5:00 P.M.</b>
Montclair	Montclair Transit Center	Wednesday, January 29, 2020	11:00 A.M. – 2:00 P.M.
*Chino Hills	<b>Chino Hills City Hall</b>	<b>Wednesday, January 29, 2020</b>	<b>4:00 P.M. – 7:00 P.M.</b>
San Bernardino	San Bernardino Transit Center	Thursday, January 30, 2020	6:00 A.M. – 9:00 A.M.
*Fontana	<b>Fontana City Hall</b>	<b>Thursday, January 30, 2020</b>	<b>3:00 P.M. – 6:00 P.M.</b>
*Ontario	<b>Dorothy Quesada Community Center</b>	<b>Monday, February 3, 2020</b>	<b>4:00 P.M. – 7:00 P.M.</b>
Colton	Arrowhead Regional Medical Center Transfer Center	Tuesday, February 4, 2020	11:00 A.M. – 2:00 P.M.
*San Bernardino	<b>Omnitrans: East Valley Facility</b>	<b>Tuesday, February 4, 2020</b>	<b>4:00 P.M. – 7:00 P.M.</b>
*San Bernardino	<b>Board Meeting</b>	<b>Wednesday, February 5, 2020</b>	<b>8:00 AM</b>
Rancho Cucamonga	Chaffey College Transit Center	Thursday, February 6, 2020	11:00 A.M. – 2:00 P.M.

\*Formal Public Hearings.

During these meetings, Omnitrans staff interacted with approximately 750 people. Omnitrans received 358 total comments at these meetings, via email, over the phone and through social media. 66% of these comments were related to the Service Change Proposals. The remaining 34% were categorized as “Other” comments.

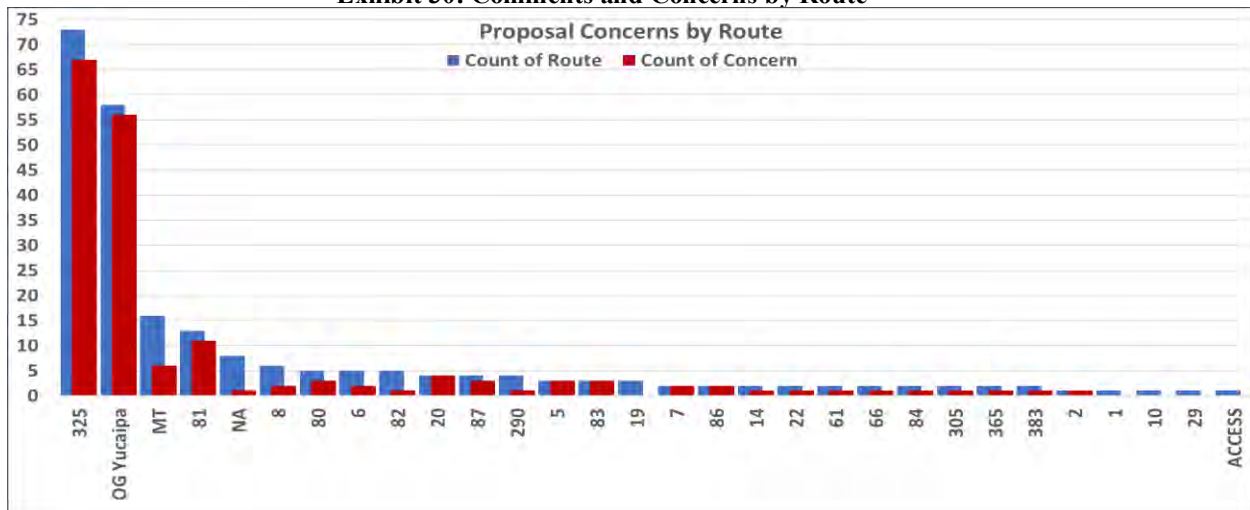


Of the comments that identified a route, a total of 70% of the comments related to OmniGo Yucaipa (Routes 308/309/310) and OmniGo Grand Terrace (Route 325). Of the 70%, 32% related to Yucaipa and essentially asked for additional service rather than service reductions. Of the 70%, 38% were related to OmniGo Grand Terrace and over half of those were from one individual. The requests in Grand Terrace related to maintain service to the Grand Terrace Senior Center and maintaining a one-seat ride between the VA Hospital and the Senior Center.

While Omnitrans understands the requests from these communities, the primary services in these areas are not financially sustainable. In both cases, Omnitrans’ Special Transportation Services Department partners with the cities through the Regional Mobility Partnership (RMP) program. A new call for projects has been issued for the RMP program and Omnitrans will help the cities apply for additional grant funding.

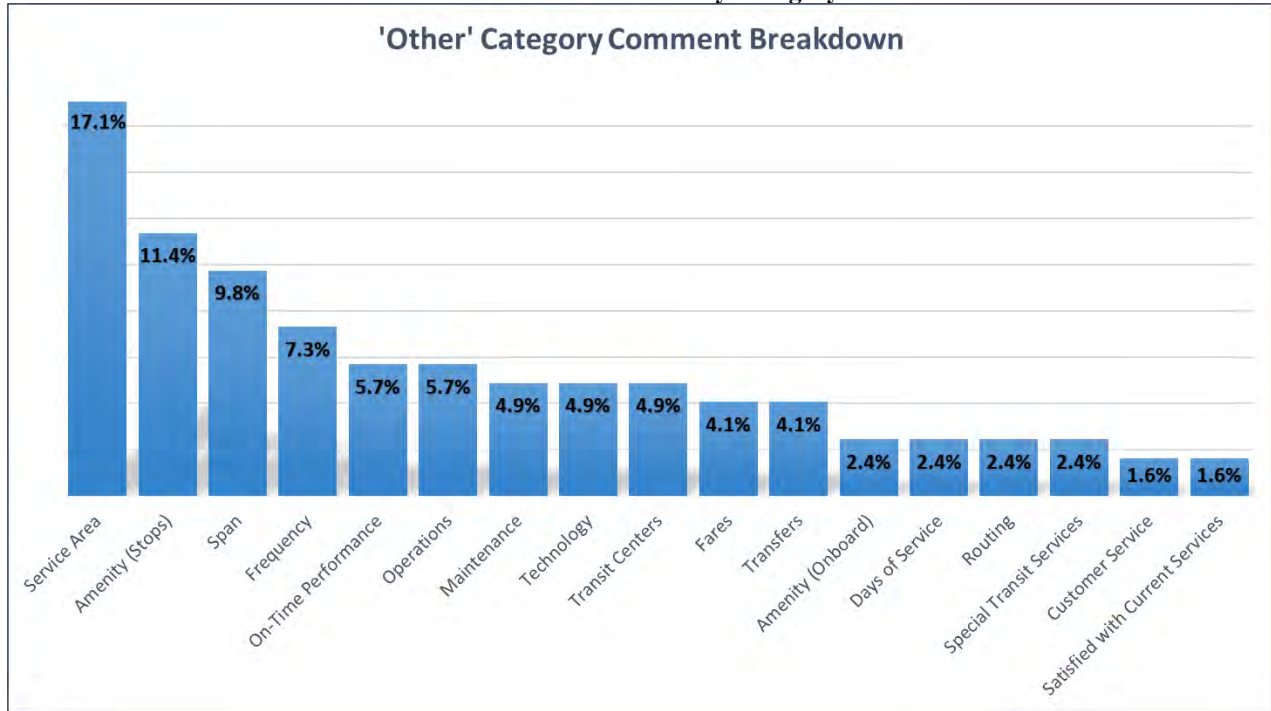
Exhibit 30 shows the distribution of comments by route. The blue is the total number of comments, the red the total number of concerns, and then the gap between the blue and the red show the share of positive comments by route. As can be seen in this graph, there were very few comments on any service change other than OmniGo Grand Terrace (325) and OmniGo Yucaipa. The only other comment with double digit concerns related to Route 81, where there were requests to maintain service to Ontario Mills. Following these comments, Omnitrans was able to maintain service to Ontario Mills.

**Exhibit 30: Comments and Concerns by Route**



The breakdown of the 34% of “Other” comments can be seen in Exhibit 31. The four most common other comments include: 1) a desire for additional service area, with Redlands Community Hospital and South Ontario/Chino coming up most frequency, 2) requests for additional stop amenities including shelters and benches, 2) Request for longer service, particularly on weekend evenings, and 3) more frequency across routes that were not seeing service changes.

**Exhibit 31: Other Comments by Category**



### 8.2 SERVICE EQUITY ANALYSIS

OmniTrans is required to complete a Title VI service equity analysis for every fare and/or major service change before it occurs. These requirements are outlined in the FTA Circular 4702.1B, dated October 1, 2012, and more generally in Section 601 of Title VI of the Civil Rights Act of 1964. This states that no person will be discriminated against, excluded from, or denied service based on race, color, or national origin. In order to abide by the Civil Rights Act, each transit agency must report on the services it provides in relation to the population in its service area. In this way, it must demonstrate that no group or groups are being denied service based on discriminatory planning.

Exhibit 32 renders all the proposed route changes in total. Note that OmniGo Route 365 in Chino Hills will be eliminated and replaced by a MicroTransit Option. The blue routes show the existing network of routes following the proposed September 2020 service change. The red routes shows routes or part of routes that exist today that would no longer exist following the September 2020 service change.

Exhibit 32: System Map Changes

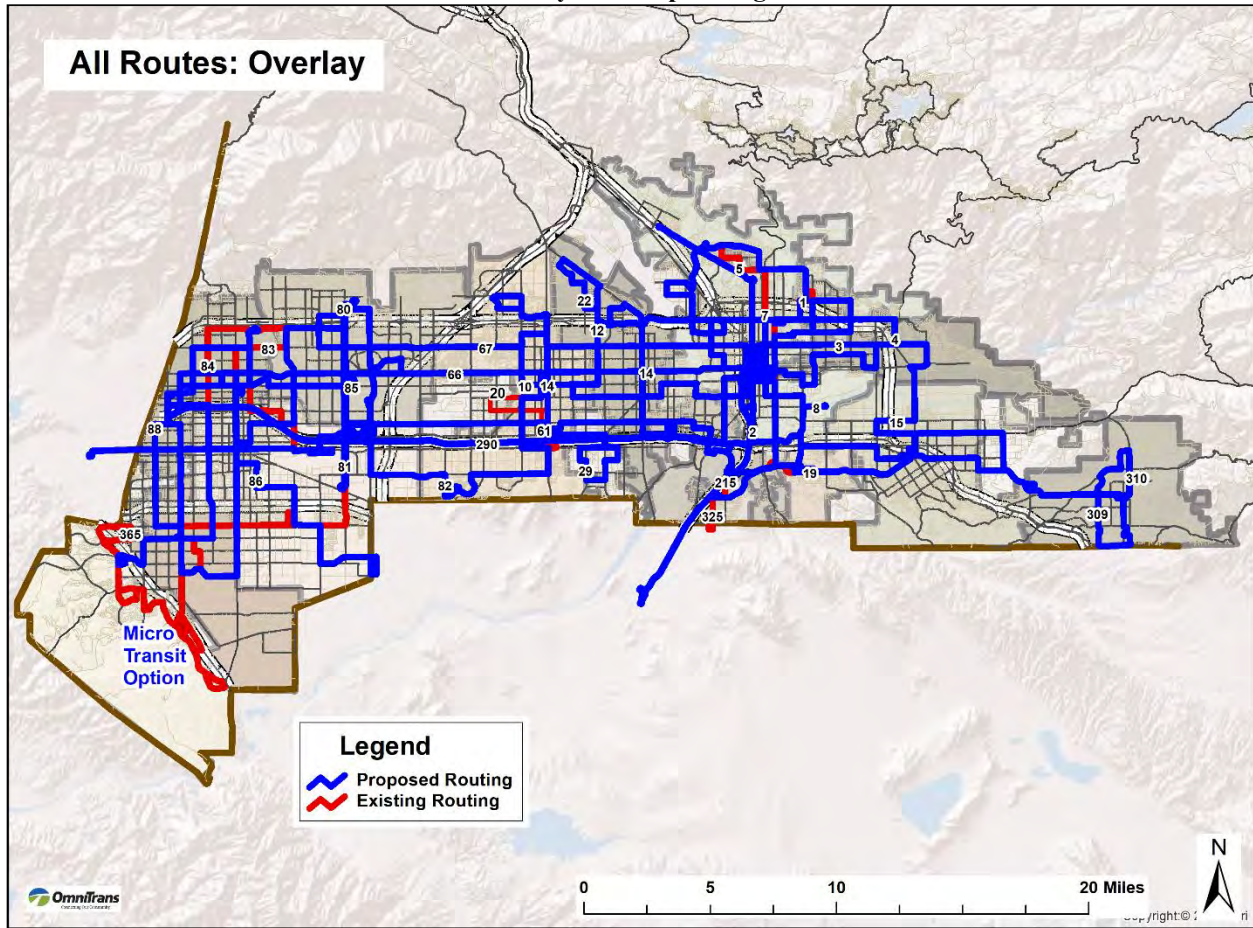


Exhibit 33 shows the tabulated data of all service equity analyses performed for all proposed route changes. In each case of a change, the percent minority and percent Low-Income/Minority (LIM) are determined for current routing and for proposed routing. Results in each case are compared in terms of proposed change demographic profile versus the current routing demographic profile. From these two figures, the difference is obtained for both Minority proportion and for LIM proportion. This difference is measured in terms of percentage difference, Positive differences mean that the minority/LIM proportion served is greater in the proposed routing scenario than it is currently, while a negative difference means that the minority/LIM proportions of the population served would be reduced in the proposed scenario.

For the Title VI Service Equity Test up to ten-percent difference is permissible based on Omnitrans' Disparate Impact Policy service change threshold in order to remain compliant with Title VI requirements, and positive changes should always be compliant. In each comparison, the difference is adjudicated as being within acceptable bounds or not.

All proposed changes are within acceptable bounds. None of the proposed changes result in disparate impact or impose disproportionate burdens on minority populations, and for these reasons, Omnitrans will remain compliant with its Title VI obligations.

**Exhibit 33: Demographic Comparison of Service Changes**

COMPARISON TO ROUTES	% Minority	% LIM	Difference	Within Acceptable Bounds?
Population of County (ACS 2015 data)	70.1%	73.3%		
Population of Service Area (Includes Area within ALL JPA Cities' Limits)	72.4%	76.9%		
Population of ADA/Access Service Area	75.4%	79.6%		
<b>ROUTE COMPARISONS</b>				
<b>ROUTES 1, 5, 7, and 325 (Proposed Routes 1, 6, 305)— Route 6, Golden Alternative</b>				
Half-Mile of Current Routes Affected by Changes	77.5%	84.0%		
Half-Mile of Proposed Fixed Route Changes	79.1%	85.1%	1.5%	Yes
<b>For Local Demographic Character Associated with Routes (One Mile Buffer):</b>				
One Mile of Current Routes Affected by Changes	78.7%	84.6%		
One Mile of Proposed Fixed Route Changes	80.0%	85.5%	0.9%	Yes
<b>ROUTE 8</b>				
Half-Mile of Current Routes Affected by Changes	61.8%	69.1%		
Half-Mile of Proposed Fixed Route Changes	61.7%	68.1%	-0.1%	Yes
<b>For Local Demographic Character Associated with Routes (One Mile Buffer):</b>				
One Mile of Current Routes Affected by Changes	64.1%	71.9%		
One Mile of Proposed Fixed Route Changes	64.1%	71.9%	No Change	Yes
<b>ROUTE 29 (Proposed Route 29)</b>				
Half-Mile of Current Routes Affected by Changes	85.4%	88.3%		
Half-Mile of Proposed Fixed Route Changes	84.9%	88.2%	-0.5%	Yes
<b>For Local Demographic Character Associated with Routes (One Mile Buffer):</b>				
One Mile of Current Routes Affected by Changes	85.5%	88.3%		
One Mile of Proposed Fixed Route Changes	85.6%	88.4%	0.1%	Yes
<b>ROUTE NEW 81, 86 (Proposed Alternative to 81, 86)</b>				
Half-Mile of Current Routes Affected by Changes	71.8%	75.3%		
Half-Mile of Proposed Fixed Route Changes	70.9%	74.6%	-0.9%	Yes
<b>For Local Demographic Character Associated with Routes (One Mile Buffer):</b>				
One Mile of Current Routes Affected by Changes	71.2%	74.7%		
One Mile of Proposed Fixed Route Changes	71.1%	74.6%	-0.1%	Yes
<b>ROUTE 82, 20 (Proposed Route 82)</b>				
Half-Mile of Current Routes Affected by Changes	83.7%	86.2%		
Half-Mile of Proposed Fixed Route Changes	83.0%	85.5%	-0.7%	Yes
<b>For Local Demographic Character Associated with Routes (One Mile Buffer):</b>				
One Mile of Current Routes Affected by Changes	82.7%	85.1%		
One Mile of Proposed Fixed Route Changes	82.1%	84.5%	-0.6%	Yes
<b>ROUTE 83, 84 and 383 Upland Circulator / Upland OmniGo Proposal</b>				
Half-Mile of Current Routes Affected by Changes	70.6%	74.5%		
Half-Mile of Proposed Fixed Route Changes	72.8%	76.5%	2.2%	Yes
<b>For Local Demographic Character Associated with Routes (One Mile Buffer):</b>				
One Mile of Current Routes Affected by Changes	69.9%	73.7%		
One Mile of Proposed Fixed Route Changes	72.6%	76.3%	2.7%	Yes
<b>ROUTE 308</b>				
City of Yucaipa Demographics for Comparison	33.9%	43.3%		
Half-Mile of Proposed Fixed Route Changes	37.0%	50.7%	3.1%	Yes
<b>For Local Demographic Character Associated with Routes (One Mile Buffer):</b>				
City of Yucaipa Demographics for Comparison	33.9%	43.3%		
One Mile of Proposed Fixed Route Changes	36.6%	47.3%	4.0%	Yes
<b>ROUTE 365</b>				
Cities of Chino & Chino Hills Demographics for Comparison	69.4%	71.8%		
Half-Mile of Proposed Fixed Route Changes	70.1%	72.4%	0.7%	Yes
<b>For Local Demographic Character Associated with Routes (One Mile Buffer):</b>				
Cities of Chino & Chino Hills Demographics for Comparison	69.4%	71.8%		
One Mile of Proposed Fixed Route Changes	70.3%	72.6%	0.8%	Yes
<b>PROPOSED ROUTE CHANGES ONLY</b>				
Half-Mile of Current Routes Affected by Changes	74.1%	78.6%		
Half-Mile of Proposed Fixed Route Changes	74.4%	78.9%	0.3%	Yes
<b>For Local Demographic Character Associated with Routes (One Mile Buffer):</b>				
One Mile of Current Routes Affected by Changes	74.6%	78.9%		
One Mile of Proposed Fixed Route Changes	85.5%	88.0%	9.1%	Yes
<b>10-, 15-, 20-Minute Frequency Service</b>				
Half-Mile of Current Routes Affected by Changes	82.5%	86.8%		
Half-Mile of Proposed Fixed Route Changes	82.6%	86.8%	0.1%	Yes
<b>30-Minute Frequency Service</b>				
Half-Mile of Current Routes Affected by Changes	75.6%	80.2%		
Half-Mile of Proposed Fixed Route Changes	75.3%	79.9%	-0.3%	Yes
<b>60+-Minute Frequency Service</b>				
Half-Mile of Current Routes Affected by Changes	74.9%	78.8%		
Half-Mile of Proposed Fixed Route Changes	75.5%	79.4%	0.6%	Yes
<b>ENTIRE PROPOSED SYSTEM</b>				
Half-Mile Buffer Around 2019 Fixed Route System	75.6%	79.8%		
Half-Mile Buffer Around Proposed Fixed Route System	76.0%	80.2%	0.4%	Yes
<b>For Local Demographic Character Associated with Routes (One Mile Buffer):</b>				
One Mile of Current Routes Affected by Changes	74.4%	78.7%		
One Mile of Proposed Fixed Route Changes	74.7%	79.0%	0.3%	Yes



# IEUA Ten-Year Forecast

## Fiscal Year 2020/2021

Attachment: City of Chino Appeal Request Form and Supporting Documentation (Appeal of the Draft RHNA Allocation for the City of Chino)





# Inland Empire Utilities Agency

## Fiscal Year 2020/21

### Ten-Year Forecast

**Inland Empire Utilities Agency**  
6075 Kimball Avenue  
Chino, CA 91708

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# Executive Summary

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## TEN-YEAR FORECAST PURPOSE

The Board of Directors of the Inland Empire Utilities Agency (the Agency) adopts a Ten-Year Forecast (TYF) based on the growth and regulatory requirements, existing asset management needs, comments, and recommendations from the Regional Technical and Policy Committees, pursuant to the terms of the Regional Sewage Service Contract. The TYF includes wastewater strength and flow forecasts and a description of planned capital projects, including any necessary facility expansions, major asset replacement and rehabilitation, and major capital equipment purchases. The TYF also provides a summary of the capital costs and capital financing plans associated with the following Agency program funds:

- Regional Wastewater Capital Improvement (RC)
- Regional Wastewater Operations and Maintenance (RO)
- Recycled Water (WC)
- Non-reclaimable Wastewater (NC)
- Groundwater Recharge (RW)
- Administrative Services (GG)
- Water Resources (WW)

The Fiscal Year (FY) 2020/2021 TYF outlines capital projects through FY 2029/30. Two major themes of the TYF are: (1) the need for rehabilitation and replacement (R&R) and maintenance of aging equipment and facilities; and (2) the need for expansion of the Regional System to meet expected future growth. Considering the age and condition of the Agency's facilities and infrastructure, appropriate funding of R&R and routine preventive maintenance is critical in ensuring the reliability and quality of the services the Agency is committed to providing its customers. The combination of these needs has resulted in a proposed FY 2020/21 TYF of \$920.7 million (see Table 1).

Major projects in the FY 2020/21 TYF include: the expansion of the liquids treatment and the construction of a wastewater solids handling facility at Regional Water Recycling Plant No. 5 (RP-5), which will replace Regional Water

Plant No. 2 (RP-2) infrastructure located in a flood zone; rehabilitation and upgrades to Regional Water Recycling Plant No. 4 (RP-4); and the completion of the groundwater basin improvements per the 2013 Recharge Master Plan Update.

Major projects near the end of the ten-year planning horizon include the liquids capacity recovery and solids treatment expansion of the Water Recycling Plant No. 1 (RP-1). Project construction is expected to begin in FY 2026/27, while an evaluation of efficiency projects will be used to refine the timing and criticality of the project implementation. Based on an asset assessment completed by Agency staff

TABLE 1: COMPARISON OF FY 2019/20 TO FY 2020/21  
TEN-YEAR CAPITAL PROJECT FORECAST (\$ IN MILLIONS)

Fund	FY 2019/20	FY 2020/21
Administrative Services Fund (GG)	\$13.6 M	\$ 10.3 M
Non-Reclaimable Wastewater Fund (NC)	\$30.5 M	\$ 32.2 M
Regional Capital Improvement Fund (RC)	\$513.1 M	\$ 678.0 M
Regional Operations and Maintenance (RO)	\$107.8 M	\$ 105.7 M
Recharge Water Fund (RW)	\$26.5 M	\$ 21.2 M
Recycled Water Fund (WC)	\$204.4 M	\$ 60.9 M
Water Resources Fund (WW)	24.7	\$12.4
<b>TOTAL</b>	<b>\$920.6 M</b>	<b>\$ 920.7 M</b>

\*All values rounded, exact FY 2020/21 numbers can be found in TYF 20/21 Project List (Appendix A)

# Introduction

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## TEN-YEAR FORECAST PURPOSE

The purpose of the TYF is to catalog and schedule capital improvement projects over a multiyear period. Pursuant to Section 9 of the Regional Sewage Service Contract, the Agency submits a ten-year forecast of capacity demands and capital projects to the Regional Technical and Policy Committees. This TYF identifies projects for the FY 2020/2021 through FY 2029/2030 that are needed for the rehabilitation, replacement, or expansion of the facilities owned or operated by the Agency.

The TYF is a document that outlines the Agency's capital priorities through a list of ongoing and future projects. Projects identified in the TYF are necessary in accomplishing the Agency's goals of ensuring reliability and safety while meeting all regulatory requirements, based on physical conditions of assets and the forecasted regional projections of water and wastewater needs. According to these projections, the TYF proposes a schedule for the implementation of projects based on necessity. The timing of the projects identified in the TYF are further refined during the Capital Budget process, based on the availability of financial resources.

## DEFINITION OF A CAPITAL PROJECT

The TYF is composed of a list of Capital Projects, which are projects that involve the purchase, improvement, or construction of major fixed assets and equipment, such as the expansion of treatment plants, the construction of pipeline and pump stations, and the replacement of equipment. Capital projects do not include funds spent on standard operation and maintenance.

## REGIONAL SEWAGE SERVICE CONTRACT REQUIREMENTS AND TYF ADOPTION

The Regional Sewage Service Contract is the guiding document that defines the terms of the services and facilities in the Agency's regional sewage system. The contract was originally signed in January 1973, amended in 1984 and 1994, and is



due for renewal in January 2023, 50 years after it was originally executed.

As required by the Regional Sewage Service Contract, the TYF includes wastewater flow forecasts and a description of planned capital projects, including any necessary facility expansions, major asset replacement and rehabilitation, and major capital equipment purchases. Projected annual expenditures and financing will be developed in the Agency’s annual Operating and Capital Program Budget. After detailed review, comments and recommendations from the Regional Technical and Policy Committees and the Agency’s Board of Directors, the TYF is adopted.



INTRODUCTION

## IEUA AGENCY OVERVIEW

The Agency is a regional wastewater treatment agency and wholesale distributor of imported water. The Agency is responsible for serving approximately 875,000 people over 242 square miles in western San Bernardino County. The Agency is focused on providing three key services: (1) treating wastewater, developing recycled water, local water resources, and conservation programs to reduce dependence on imported water supplies and provide local supply resiliency to the region; (2) converting biosolids and waste products into a high-quality compost made from recycled materials; and (3) generating electrical energy from renewable sources. This Ten-Year Forecast, beyond being a requirement of the Regional Sewage Service Contract between the Agency and its Contracting Agencies, is also a means of communicating the future projects and capital spending needed to meet future demands in the service area.

## FORMATION & PURPOSE

The Agency was originally formed as the Chino Basin Municipal Water District on June 6, 1950 as a municipal corporation with the mission to supply supplemental imported water purchased from the Metropolitan Water District of Southern California (MWD) to municipalities in the Chino Basin. Since then, the Agency has expanded its mission from a supplemental water supplier to include regional wastewater treatment with both domestic and industrial disposal systems, and energy production facilities. In addition, the Agency has become a major provider of recycled water, a supplier of biosolids/compost materials, and continues its leading role in water quality management and environmental protection in the Inland Empire.

## GOVERNANCE

The Agency is a special district governed by five publicly elected Board of Directors. Each director is assigned to one of the five divisions which generally serve the following regions: Division 1- Upland/Montclair; Division 2- Ontario; Division 3- Chino/Chino Hills; Division 4- Fontana; and Division 5- Rancho Cucamonga. Monthly meetings are also held with the Regional Technical and Policy Committees comprised of representatives from each of the Agency's Regional Sewer Service Contracting Agencies. These Committees discuss and provide recommendations on various technical and policy issues affecting the Agency.

## INTER-AGENCY COORDINATION IN THE CHINO BASIN

The Agency joined the Santa Ana Watershed Project Authority (SAWPA) in 1972 to participate in regional watershed-scale planning. The Agency also sits on the Board of Directors for MWD, SAWPA, and Chino Basin Watermaster (CBWM).

The Agency collaborates with SAWPA, MWD, CBWM, and the Regional Water Quality Control Board (RWQCB) to develop regional planning documents. The Agency also works with state agencies, such as the Department of Water Resources and California Environmental Protection Agency, in the development of State of California planning documents.

## CONTRACTING AND RETAIL AGENCIES

As a regional wastewater treatment agency, the Agency provides sewage utility services to seven contracting agencies under the Chino Basin Regional Sewage Service Contract: the cities of Chino, Chino Hills, Fontana, Montclair, Ontario, and Upland along with Cucamonga Valley Water District. Figure 1 depicts each Contracting Agency's sphere of influence within the Agency's service area.

In addition to the contracting agencies, the Agency provides wholesale imported water from MWD to seven retail agencies: the cities of Chino, Chino Hills, Ontario, Upland, CVWD in the city of Rancho Cucamonga, Fontana Water Company in the city of Fontana, and the Monte Vista Water District (MVWD) in the city of Montclair.

## REGIONAL PROGRAMS & FACILITIES OVERVIEW

Although IEUA is a wholesale water provider, the Agency has few assets or infrastructure related to water treatment, conveyance, or use. The majority of assets are connected to the regional wastewater system, salinity management system, recycled water program, and groundwater recharge program.

### Regional Wastewater Facilities

The Agency has four Regional Water Recycling Plants (RWRPs) which produce recycled water that meet Title 22 standards for indirect reuse and groundwater recharge. The four regional facilities are: RP-1, RP-4, RP-5, and Carbon Canyon Wastewater Recycling Facility (CCWRF). All of the RWRPs have primary, secondary,

and tertiary treatment and recycled water pumping facilities that are interconnected in a regional network. Agency staff use sewage bypass and diversion facilities, such as the San Bernardino Lift Station, Montclair Diversion Structure, Etiwanda Trunk Line, and Carbon Canyon bypass, to optimize the Agency's flows and capacity utilization. In general, flows are routed between regional plants in order to maximize recycled water deliveries while minimizing overall pumping and treatment costs. Figure 1. illustrates the contracting agencies and regional wastewater facilities.

The Agency also has three facilities where the biosolids from the water recycling plants are handled: RP-1 Solids Handling Facility, RP-2 Solids Handling Facility, and the Inland Empire Regional Composting Facility (IERCF).

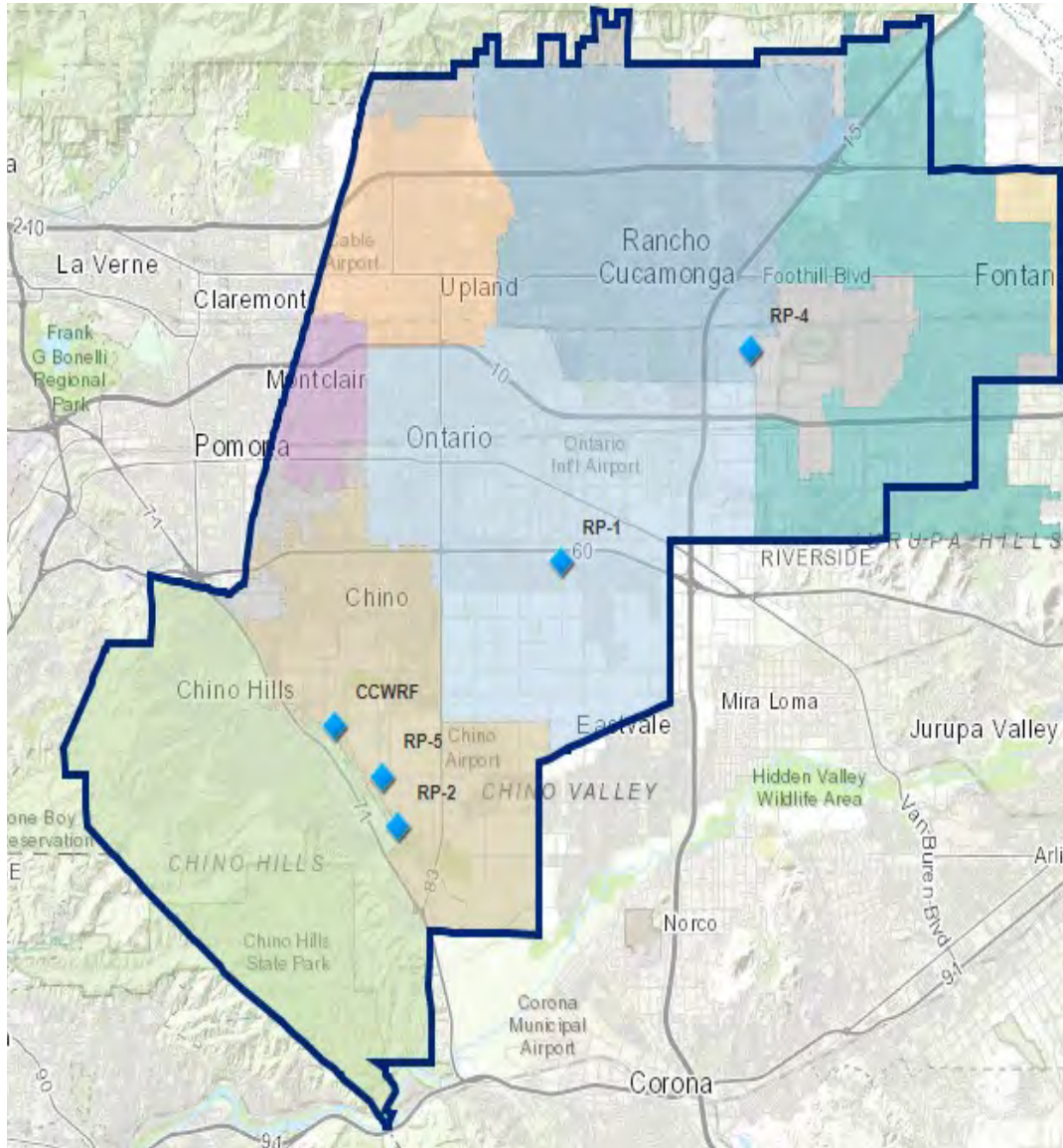
The Agency has a network of regional interceptor sewers that can be used to bypass sewer flow from one water recycling plant to another to balance and optimize the use of treatment capacity. Currently, the regional interceptors can bypass flow from RP-4 to RP-1 and from CCWRF to RP-5. In addition, primary effluent can be bypassed from the RP-1 equalization basins to RP-5.

The Agency also has four Regional Sewage System lift stations. These are used to shift flows that would naturally flow to one portion of the service area to a different treatment plant. This balancing of flows keeps water in the northern portion of the service area, maximizing potential recycled water use. The lift stations are:

- Montclair Lift Station – pumps sewage from portions of Montclair, Upland, and Chino to RP-1 and CCWRF.
- Preserve Lift Station – pumps sewage from the Prado Regional Park and The Preserve community in the City of Chino to RP-5.
- RP-2 Lift Station – pumps sewage from the southeastern portions of the cities of Chino and Chino Hills and the solids treatment side streams from RP-2 to RP-5.
- San Bernardino Avenue Pump Station – pumps a portion of the flow from the City of Fontana to RP-4.

The Agency's Regional Program encompasses the activities associated with repair and replacement (R&R) of the Agency's wastewater, energy generation, and solids handling facilities. The Regional Sewerage System connects several regional water recycling plants.

FIGURE 1: IEUA CONTRACTING AGENCIES & REGIONAL WASTEWATER FACILITIES



### RP-1 (Northern Service Area)

Regional Water Recycling Plant No. 1 (RP-1) is located in the City of Ontario near the intersection of Highway 60 and Archibald Avenue. This facility was originally commissioned in 1948 and has undergone several expansions to increase the design wastewater treatment capacity to approximately 44 MGD, based on the sewage characteristics at the time of the expansions. Although the projected sewage flows do not show a significant increase from current to build-out, they do reflect higher loading characteristics that require treatment process modifications to meet effluent discharge regulations. RP-1 serves the areas of Ontario, Upland, Fontana, Chino, Montclair and Rancho Cucamonga, and currently treats approximately 24.5 MGD.

RP-1 also has biosolids treatment, designed at a capacity of approximately 60 MGD. Treatment consists of gravity thickening and dissolved air flotation thickening, anaerobic digestion, and dewatering by centrifuges. RP-1 handles solids from both RP-1 and RP-4. The stabilized, dewatered solids are trucked to the IERCF in the City of Rancho Cucamonga for further treatment to produce Grade A compost.

### **RP-4 (Northern Service Area)**

The Regional Water Recycling Plant No. 4 (RP-4) is located in Rancho Cucamonga and has been in operation treating sewage and producing recycled water since 1997. The RP-4 facility capacity was doubled in 2009 from 7 MGD to 14 MGD.

Waste sludge generated at RP-4 is discharged back to the sewer and flows by gravity to RP-1. RP-4 serves areas of Fontana and Rancho Cucamonga, treating approximately 9.7 MGD.

### **CCWRF (Southern Service Area)**

The Carbon Canyon Water Reclamation Facility (CCWRF) is located in the City of Chino and has been in operation since May 1992. The CCWRF works in tandem with RP-2 and RP-5 to serve the areas of Chino, Chino Hills, Montclair, and Upland.

Wastewater is treated at CCWRF while the biosolids removed from the wastewater flow are pumped to RP-2 for processing. The CCWRF is designed to treat an annual average flow of 11.4 MGD and treats approximately 8.0 MGD.

### **RP-2 (Southern Service Area)**

The Regional Plant No. 2 (RP-2) in the City of Chino has been in operation since 1960. RP-2 was both a liquids and solids treatment facility until 2004, when RP-5 was constructed to handle the liquids portion. Since then, RP-2 treats only the solids from CCWRF and RP-5. RP-2 treatment processes include: gravity thickening and DAF thickening, anaerobic digestion for stabilization, and dewatering by either belt press or centrifuge.

Once the solids are dewatered, they are transported to the IERCF. RP-2 is located on land leased from the US Army Corps of Engineers and the lease is due to expire in 2035. RP-2 is also located within the recently redefined flood zone behind Prado Dam. Orange County Flood Control District and the Army Corps have plans to raise the maximum operational water level behind the dam to allow greater water storage

and conservation. Since RP-2 does not have physical flood protection, IEUA will relocate the solids handling from RP-2 to RP-5. The relocation of solids handling is expected to occur in 2023.

## **RP-5 (Southern Service Area)**

The Regional Water Recycling Plant No. 5 (RP-5) is located immediately east of the Agency's Administrative Headquarters campus in the City of Chino and began operation in March 2004. It has a capacity rating of 16.3 MGD, which includes capacity for approximately 15 MGD of raw sewage and 1.3 MGD of solids processing return or recycled flows from RP-2. Waste sludge produced at RP-5 is pumped to the RP-2 solids handling facility, which will be relocated to RP-5 around 2023. RP-5 serves areas of Chino, Chino Hills, and Ontario, treating approximately 8.2 MGD.

The RP-5 Solids Handling Facility (RP-5 SHF) was operated by IEUA from 2001 to 2009 as a regional facility accepting dairy manure for recycling and generating biogas. In 2010, IEUA entered into a lease agreement with Environ Strategies (now Inland BioEnergy) and in 2012, they began utilizing the facility for digestion of primarily food wastes with minor amounts of dairy manure. RP-5 SHF can process 705 wet tons/day of food and dairy waste through an anaerobic digestion process and can generate electricity from the biogas produced. As of August 2017, Inland Bio Energy stopped regular Operations of the facility. Due to the regional benefits of such a waste handling facility and the reduced energy costs, the Agency plans to keep RP-5 SHF available for the processing of food and dairy waste.

## **IERCF**

The IERCF is the largest indoor composting facility in North America. It was constructed and began daily operations in 2007 under a Joint Powers Authority agreement between the Agency and the SDLAC. The IERCF, located in Rancho Cucamonga, is completely enclosed in order to control odors and to meet stringent air quality regulations.

The IERCF uses the aerated static pile composting process to recycle approximately 150,000 wet tons/year of dewatered and stabilized biosolids from the Agency, SDLAC, and OCSD's wastewater treatment processes, as well as wood waste from local communities. It produces approximately 230,000 cubic yards of high-quality compost each year for local landscaping, agricultural, and horticultural use. The

composted product, marketed as SoilPro. Premium Compost, is sold as a soil conditioner which helps improve water retention, resulting in improved plant growth and water savings.

The facility has been operating at its design capacity for over 10 years, receiving nearly 800 tons of biosolids and recycled waste products each workday and has maintained a perfect compliance record.

## **SALINITY MANGEMENT PROGRAM**

Maintaining a low salinity (total dissolved solids, TDS) level in recycled water is critical in ensuring that recycled water can be used for groundwater recharge and other uses. To reduce the salinity, the Agency operates a Non-Reclaimable Wastewater System (NRWS). As shown in Figure 2., the NRWS is comprised of 75 miles of pipelines and pump stations that export high-salinity industrial wastewater generated within the Agency's service area to the Pacific Ocean. This system also ensures that the regional water recycling plants do not exceed the TDS discharge limits established by the RWQCB. The NRWS is comprised of a north and a south system. The north system conveys non-reclaimable wastewater to the Sanitation Districts of Los Angeles County (SDLAC) for treatment and disposal and serves approximately 37 industries. The south system conveys wastewater through the brine line owned by SAWPA, to the Orange County Sanitation District (OCSD) and serves approximately 11 industries, including five indirect dischargers which haul their wastewater to a Brine Line Collection Station.

Discharges to the NRWS consists mainly of industrial and groundwater treatment brines. The Agency also discharges centrate resulting from the dewatering of the biosolids treated at RP-1, as well as some domestic sewage from two dischargers. The NRWS is physically separated from the Regional Wastewater System and provides a means for segregating non-reclaimable, high salinity waste for export out of the Agency's service area.

The Agency also has a single NRWS lift station that is used to shift naturally occurring flows.

- Philadelphia Lift Station – pumps industrial discharge from portions of the Northern system to the main trunk line.

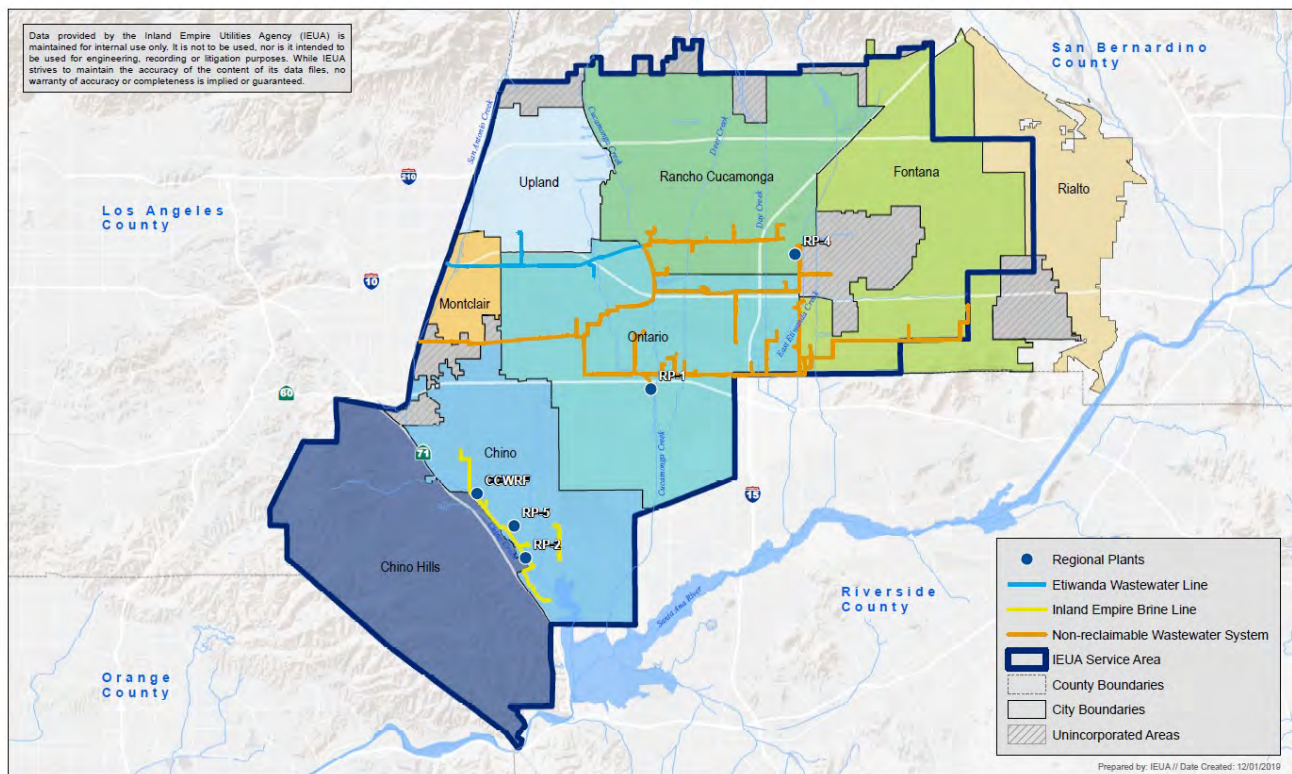


By maximizing the use of the NRWS, the quality of recycled water is improved for local use and helps ensure that the Agency can comply with the final effluent TDS and total nitrogen limits listed in the National Pollutant Discharge Elimination System (NPDES) permit. The combined northern and southern NRWS system removed 47,486 tons of salt in FY 2018/19 from the service area, reducing the region’s salinity and enhancing the opportunities for beneficial use of recycled water.

In addition to the NRWS system, the salinity management program includes a residential Self-Regenerating Water Softener Removal Rebate Program. This program incentivizes the removal of self-regenerating salt-based devices which increase the salinity of plant influent and thus also increases salinity of recycled water supplies.

The Agency also operates the Chino Basin Desalter I facility as a Chino Basin Desalter Authority (CDA) Joint Powers Authority member. The Desalter I facility purifies brackish groundwater extracted from the lower Chino Basin and then distributes the drinking water to eight member agencies, including IEUA. Figure 3 includes a map of the CDA infrastructure.

FIGURE 2: NON-RECLAIMABLE WASTEWATER SYSTEM (NRWS)



Inland Empire Utilities Agency

Prepared by: IEUA // Date Created: 12/01/2019



## RECYCLED WATER

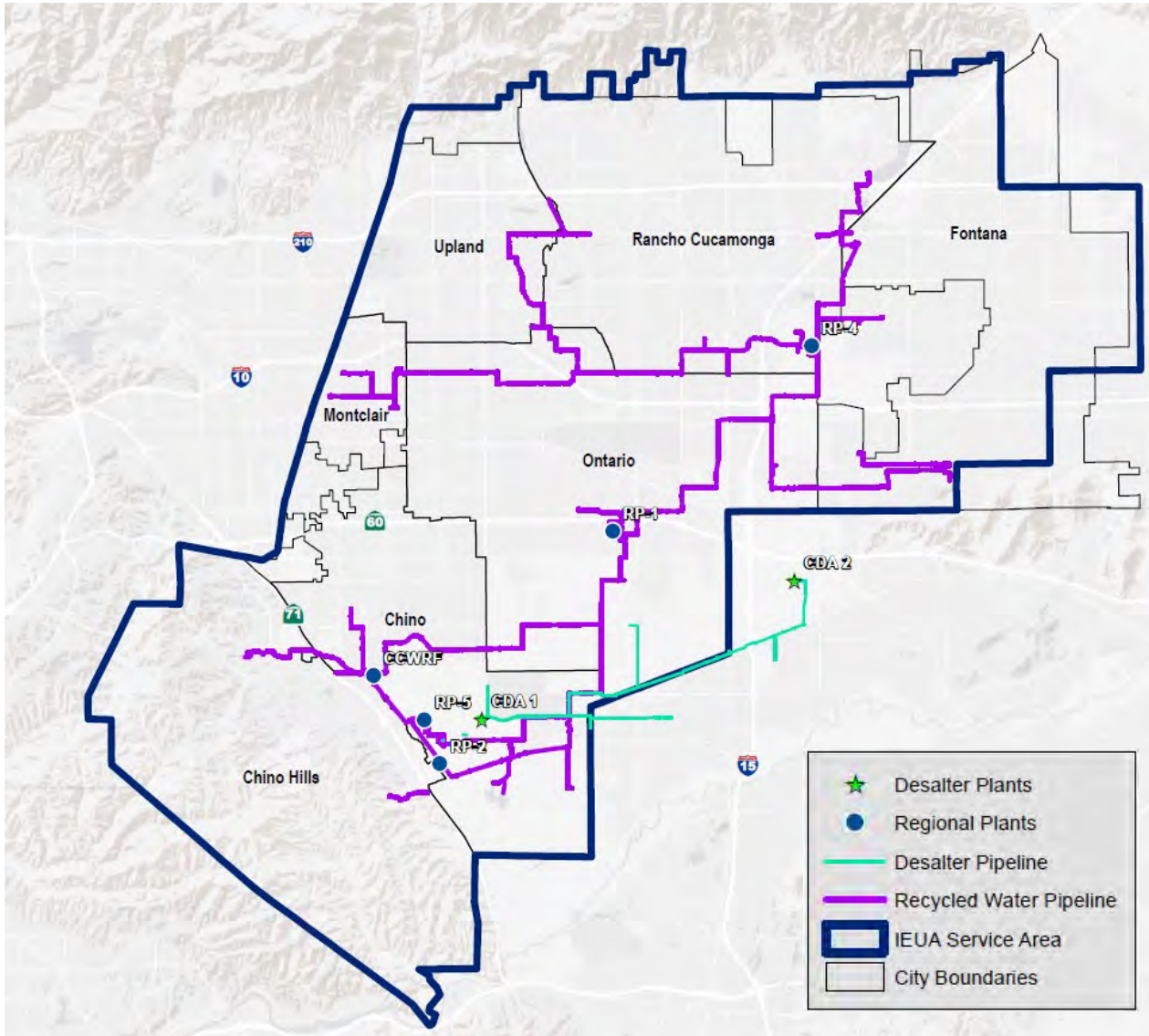
The Agency has served recycled water to its member agencies since formation of the Regional Sewage Service Contract in 1972. The Agency currently receives over 50 million gallons per day (MGD) of sewage from its member agencies. The sewage is treated to Title 22 regulations set forth by the California Department of Health Services and supplied to the recycled water distribution system.

The Recycled Water Distribution Facilities consists of a network of pipelines, pump stations and reservoirs that allow the Agency to deliver recycled water throughout the service area. Figure 3. provides a map of the recycled water distribution system. The facilities allow recycled water to be distributed into six pressure zones for direct use and groundwater recharge.

During FY 2018-19, the Agency delivered over 28,000 acre-feet (AF) of recycled water for direct use to four groundwater recharge basins (see following section on groundwater recharge for a more detailed discussion) and to customers. Major benefits of the regional recycled water program include:

- New Water Supply – delivery of approximately 30,000 AF per year of a local water supply
- Reliable Supply – is not directly impacted by drought or climate change and helps mitigate the impacts of water supply restrictions
- Local Resiliency – increases local water supply reliability and reduces dependence on water imports from the Sacramento Bay Delta
- Reduces Greenhouse Gas Emissions – requires significantly less energy to deliver to customers than imported water.

FIGURE 3: RECYCLED WATER DISTRIBUTION SYSTEM



INTRODUCTION

## GROUNDWATER RECHARGE

In conjunction with CBWM, CBWCD, and SBCFCD, the Agency conducts the groundwater recharge program within Chino Basin to replenish and maintain the Chino Groundwater Basin. Recharged water includes captured stormwater, recycled water, and imported water. The groundwater recharge projects are a means to diversify the water supply for the region and maximize the beneficial reuse of recycled water and the yield of the Chino Basin. Recycled water recharge is a key component of the region’s water supply portfolio. The more recycled water that is recharged into the Chino Groundwater Basin, the more resilient the region becomes. Figure 4. highlights groundwater recharge locations within the basin.

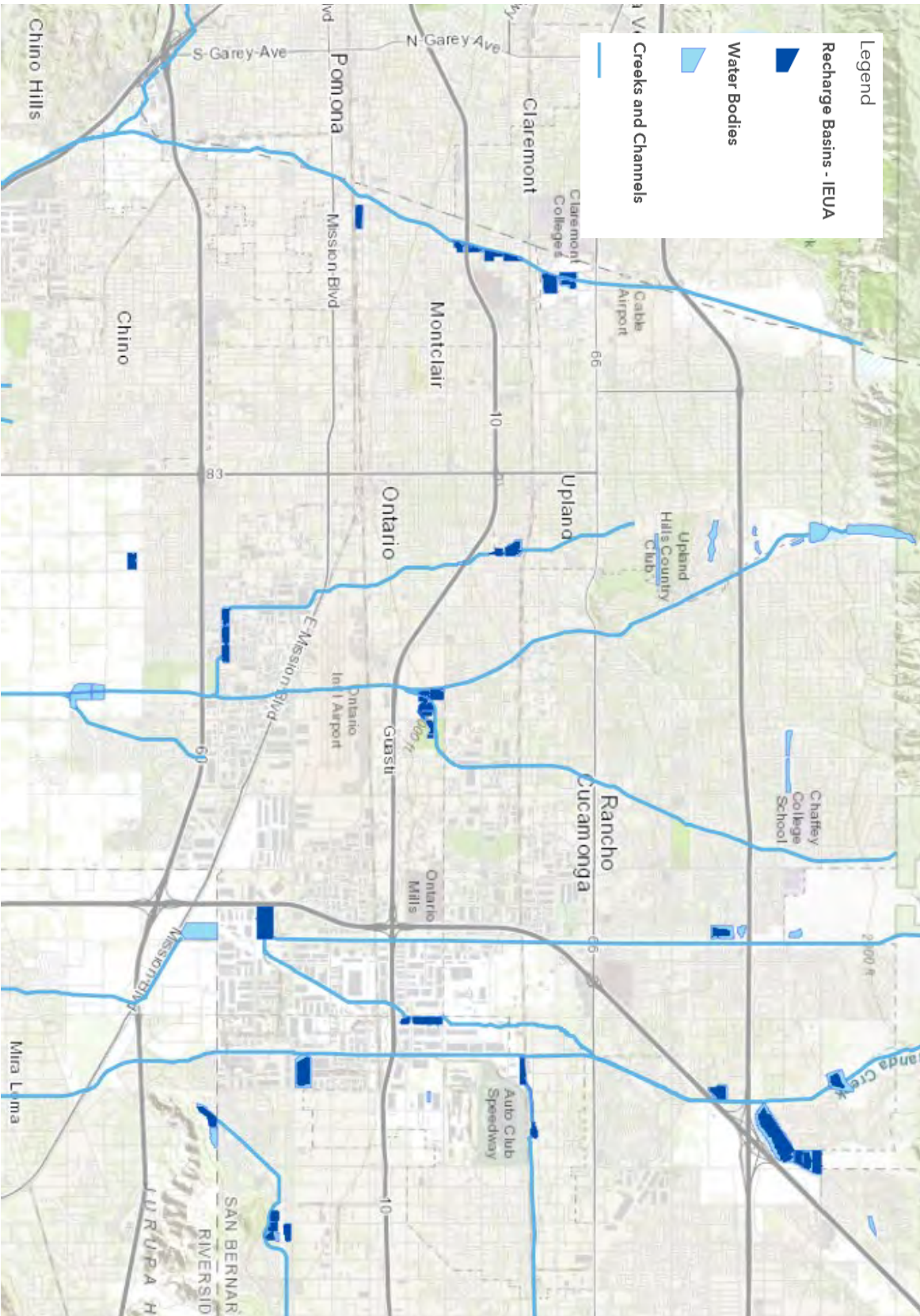
TABLE 2: MAXIMUM THERORETICAL ANNUAL RECHARGE

Recharge Site	Acre-Feet per Year
7th and 8th St. Basins	5,045
Banana Basin	1,913
Brooks Basin	2,825
College Heights Basins	8,037
Declez Basin	3,023
Ely Basins	7,375
Etiwanda Debris Basin	2,966
Grove Basin	0
Hickory Basin	2,433
Lower Day Basin	2,547
Montclair Basins	10,707
RP3 Basin	12,390
San Sevaine Basins	9,637
Turner Basins	3,673
Upland Basin	2,490
Victoria Basin	2,436
<b>Total</b>	<b>77,497</b>

Source: 2018 Recharge Master Plan Update, Table 4-1

# INTRODUCTION

FIGURE 4: CHINO BASINGROUNDWATER RECHARGE BASIN LOCATIONS



## ADDITIONAL REGIONAL PROGRAMS & FACILITIES

### Headquarters & Chino Creek Wetlands & Education Park

The Agency headquarters, located in the City of Chino, opened in the summer of 2003. It was constructed to meet the Platinum rating from the United States Green Building Council's Leadership in Energy and Environmental Design (LEED) 2004. The headquarter facilities demonstrate how using recycled building materials and state-of-the-art energy efficient technologies can be used to incorporate environmental sensibilities in an urban setting while creating a better environment, saving water, improving staff productivity, and contributing to the restoration of native landscapes. The headquarters' complex is one of the largest public landscapes in Southern California to use native plants and to have integrated stormwater management, including the restoration of natural drainage and the creation of wetlands and riparian habitat known as the Chino Creek Wetlands and Educational Park.

The Chino Creek Wetlands and Educational Park (Park) is located adjacent to the IEUA headquarters. The 22-acre Park opened in 2008 and was partially funded by a grant from the State Water Resources Control Board. It was designed to restore native habitat and natural drainage, and to showcase the environmental values of the Prado Basin, the largest freshwater habitat remaining in Southern California. The Prado Basin, within which the park resides, provides a critical link for biological and trail networks between the extensive riparian open space of the Prado Flood Control Basin and the Chino Hills State Park to the west. Prado Basin is home to endangered species, including the Least Bell's Vireo and Southwestern Willow Flycatcher.

The Park facilities include an outdoor classroom, wetlands, 1.7 miles of trails, and educational stations with signage. Local and regional school programs are held at the park, including the Water Discovery educational program funded by the State's Department of Parks and Recreation. The Park is open to the public seven days a week throughout the year, with special programs about water quality, conservation, and local ecosystems provided by the Agency.

### Laboratory

IEUA has constructed a new 17,166 sq. ft Water Quality Laboratory at its headquarters in Chino, California. The facility was built near Regional Water

Recycling Plant No.5 (RP-5) to manage water quality testing, enhance, performance, and improve the process of sample analysis.

This \$17.8 million state-of-the-art facility was awarded a Leadership in Energy and Environmental Design™ (LEED®) Gold Certification for meeting over 60 categories established by the U.S. Green Building Council. The heating and cooling equipment were designed to meet the highest energy reductions standards, which contributes to the facility's overall energy reduction of 41%. Funding for the lab was obtained through a Clean Water State Revolving Fund (SRF) loan, and the SRF program awarded a principal forgiveness grant of approximately \$1.2 million for achieving green project status.

The new lab was awarded the Outstanding Civil Engineering Water/Wastewater Project Award from the American Society of Civil Engineers in the San Bernardino and Riverside Counties branch and the Los Angeles section.

The laboratory has received an Environmental Laboratory Accreditation Program certificate and is now fully operational. The new facility includes additional instrumentation allowing lab staff to run additional analyses. Staff is currently evaluating new technologies to determine the feasibility of adding additional tests to meet the need of stricter water quality regulations.

## Renewable Energy

The Agency has made significant strides in decreasing energy costs, enhancing the Agency's ability to help achieve the State's goals of improving the reliability of the energy grid, and reducing greenhouse gasses by investing in renewable energy. In an effort to diversify and maximize renewable energy generation, the Agency entered into a Power Purchase Agreement (PPA) and had 3.5 MW of solar power installed at four of IEUA's facilities. In 2010, IEUA expanded its renewable energy agreement (PPA) and had 3.5 MW of solar power installed at four of IEUA's facilities. In 2010, IEUA expanded its renewable energy portfolio by securing a PPA for a 1.0 MW wind turbine at RP-4. In 2015, IEUA partnered with an energy firm to install 4.0 MW of advanced energy storage systems at Agency facilities, and an additional 1.5 MW of solar power. The storage systems optimize IEUA's on-site generation, store excess renewable energy, and use stored energy to power facilities when demand on the electric grid is high.

The Agency is continually evaluating new technologies that can increase sustainability. Full utilization of renewable digester gas to support sustainability and minimize gas flaring is a primary goal. Agency personnel will continue to assess operational processes and strive for optimization to reduce energy consumption and costs wherever possible.

# Treatment Plant Flow Projections

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Wastewater flow forecasts are conducted annually, and are based on four main components: (1) historical wastewater flow trends; (2) per dwelling unit wastewater generation factors, based on the 2015 Wastewater Facilities Master Plan projections; (3) actual influent flows measured at the treatment plants; and (4) expected future growth numbers provided by Contracting Agencies. These Projections are used to determine future demands on the Agency's facilities, and help anticipate the need for modifications to RWRPs and solids handling facilities.

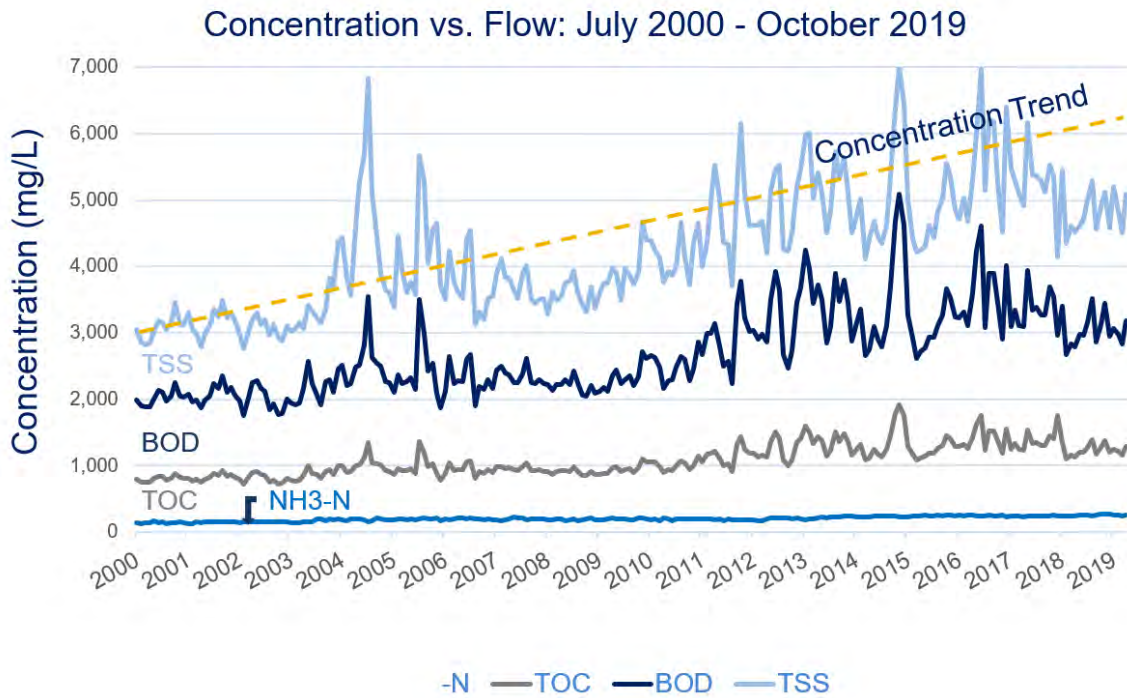
## TREATMENT PLANT FLOW TRENDS

Over the past decade the region has experienced increased indoor water use efficiency. This is a result of drought, shifting public policy, more efficient building codes and devices, and effective conservation program campaigns. At regional facilities, the result has been a decrease in the volume of sewage flows of approximately 10% since 2013. However, the influent water quality is tied to the population served. As a result of these two factors, while the population has increased, indoor water consumption has decreased, resulting in increased sewage strength. This trend is expected to continue (see Figure 5) and has resulted in regional wastewater treatment plant expansions being driven by the increased strength of sewage flows to the facilities, rather than the volume of flows to the facilities.

While sewage flows have decreased, recycled water production has increased. This increase in recycled water production can be attributed to the San Bernardino Avenue Lift Station and the Montclair Lift Station rerouting additional raw sewage flows to the recycling plants in the northern service area, which is where the recycled water system has been expanded and where groundwater recharge basins are located. In addition to moving recycled water, this regional system flexibility allows the treatment plants to operate as an interconnected system.



FIGURE 5: TOTAL WASTEWATER STRENGTH VS WASTEWATER FLOW 2000-2019



### ANTICIPATED SERVICE AREA GROWTH

In 2019 the Contracting Agencies completed a survey of their 10-year capacity demand forecast. The results of the 10-year capacity demand forecast survey are summarized in Table 3. For FY 2020/21, the forecasted activity was 9,321 EDUs. Over the next ten years, activity was projected to total 74,083 EDUs. Approximately 77% of this projected activity is a result of new development in the service areas of Ontario and Fontana. Over the next ten years, building activity is projected to be approximately 54% residential and 46% commercial/industrial (see Table 3).

### FIFTY YEAR FLOW PROJECTION

As part of the Wastewater Facilities Master Plan Update (WWFMPU), flow projections were made for each regional facility, assuming ultimate conditions will be reached by 2060. Wastewater flows are estimated to reach approximately 80.0 MGD by the year 2060 (Table 6).

Figure 7. shows the projected flows to the treatment plants in 2035 and 2060 (ultimate) based on the WWFMPU. The WWFMPU estimates that there will be a regional flow of 73.5 MGD by 2035 and an ultimate/build-out flow of 80 MGD by 2060. Although these periods are beyond the 10-year window of the current TYF, this implies that there will be facility expansions over the next 20 years. A rough timeline based on the WWFMPU findings for plant expansions is shown in Table 4. Expansions at RP-5, the relocation of RP-2 solids handling to RP-5, and the beginning of the RP-1 liquid capacity recovery and solids treatment expansion are included in the 10-year window.

TABLE 3: CONTRACTING AGENCY 10-YEAR DEMAND FORECAST BY CUSTOMER TYPE

Fiscal Year	Residential (EDUs)	Commercial/ Industrial (EDUs)	Total (EDUs)
2020/21	5,778	3,543	9,321
2021/22	5,641	3,605	9,246
2022/23	5,602	3,659	9,261
2023/24	4,483	3,450	7,933
2024/25	3,850	3,410	7,260
2025/26	3,295	3,330	6,625
2026/27	2,804	3,280	6,084
2027/28	2,724	3,250	5,974
2028/29	2,724	3,250	5,974
2029/30	3,154	3,251	6,405
<b>TOTAL</b>	<b>40,055</b>	<b>34,028</b>	<b>74,083</b>

*\*As reported on November 2019*

TABLE 4: MAJOR TREATMENT FACILITY CAPACITY/EXPANSION PROJECTS

Description	2021/25	2026/30	2031/35	2036/40	Total Cost
RP-5 Expansion					\$371 M
RP-1 Capacity Improvement					\$284 M
RP-4 Expansion					\$115 M

TABLE 5: 10-YEAR CAPACITY DEMAND FORECAST BY AGENCY (EDUs)

Fiscal Year	Chino	Chino Hills	CVWD	Fontana	Montclair	Ontario	Upland	Total
2020/21	430	182	1,650	2,406	407	3,865	381	9,321
2021/22	355	133	2,050	2,527	26	3,865	290	9,246
2022/23	262	96	2,050	2,653	25	3,865	310	9,261
2023/24	262	64	1,650	2,787	25	3,000	145	7,933
2024/25	262	6	1,250	2,787	25	2,840	90	7,260
2025/26	262	1	890	2,787	25	2,660	0	6,625
2026/27	262	0	490	2,787	25	2,520	0	6,084
2027/28	262	0	490	2,787	25	2,410	0	5,974
2028/29	262	0	490	2,787	25	2,410	0	5,974
2029/30	262	0	490	2,787	25	2,410	431	6,405
<b>TOTAL</b>	<b>2,881</b>	<b>482</b>	<b>11,500</b>	<b>27,095</b>	<b>633</b>	<b>29,845</b>	<b>1,647</b>	<b>74,083</b>
<b>Percent</b>	<b>4%</b>	<b>1%</b>	<b>16%</b>	<b>37%</b>	<b>1%</b>	<b>40%</b>	<b>2%</b>	<b>100%</b>

TABLE 6: WWFMPU PROJECTED AVERAGE INFLUENT WASTEWATER FLOW

Year	RP-1 (MGD)	RP-4 (MGD)	CCWRF (MGD)	RP-5 (MGD)	Total (MGD)
2030	29.3	12.7	6.5	14.5	63.0
2035	28.3	13.4	6.6	16.7	66.9
2040	30.9	14.0	6.7	19.0	70.7
2050	32.9	15.3	7.0	22.6	77.7
2060	33.0	16.7	7.2	23.0	80.0

Source: TM No.4, WWFMPU (CH2M Hill 2014)

FIGURE 6: PROJECTED TRIBUTARY SEWER FLOWS

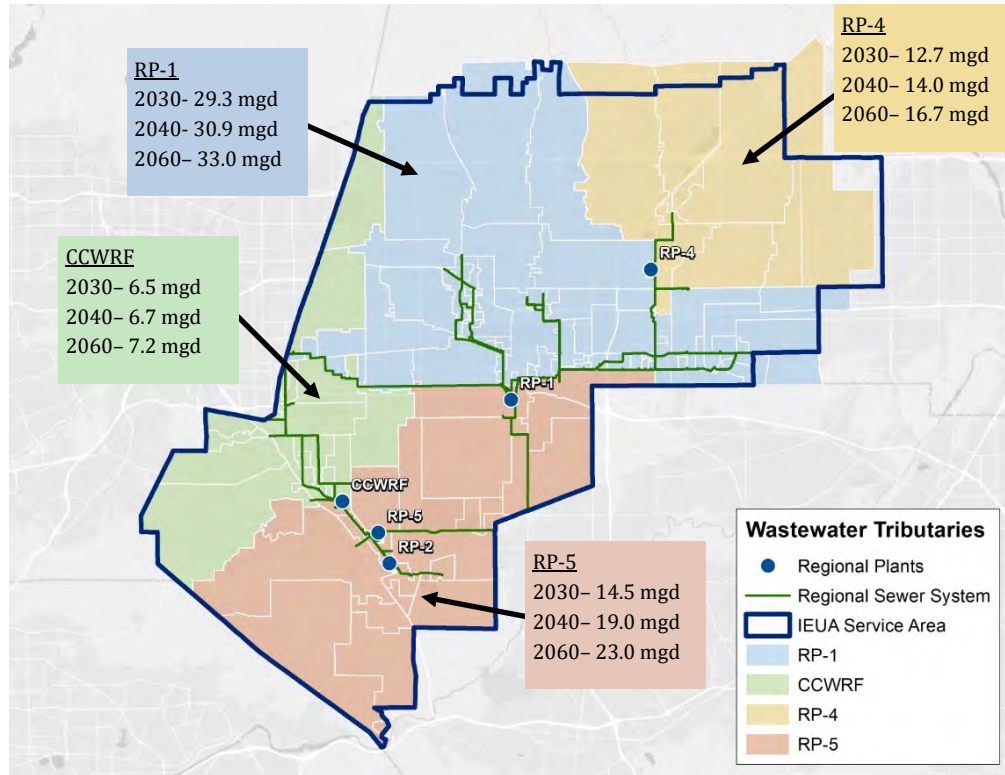
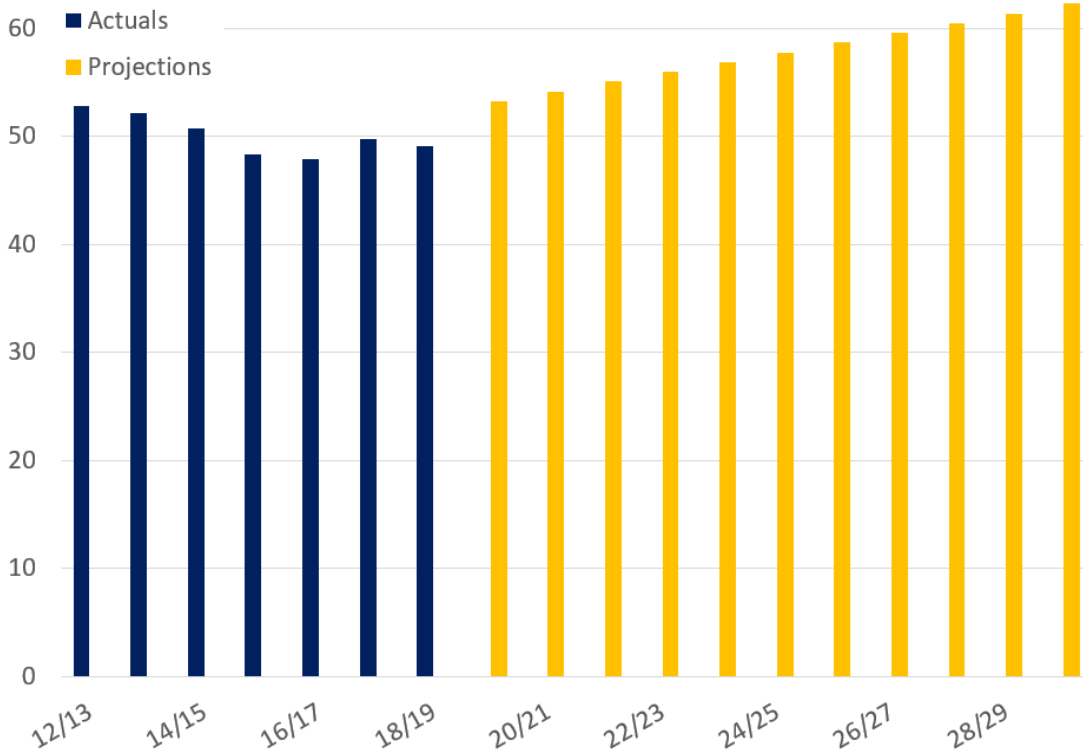


FIGURE 7: REGIONAL SYSTEM TREATED INFLUENT FLOW FORECAST





# TREATMENT PLANT FLOW PROJECTIONS

Attachment: City of Chino Appeal Request Form and Supporting Documentation (Appeal of the Draft RHNA Allocation for the City of Chino)

# Capital Improvement Projects

## PROJECT IDENTIFICATION PROCESS

The TYF contains projects which were identified by Agency staff. The two main project types are 1) repair and rehabilitation projects for existing facilities; and 2) expansion projects to provide additional treatment capacity to meet future growth.

Drivers used to determine the timeframe and necessity of projects include regulatory and permitting requirements, wastewater flow projections, asset age, performance, efficiency, and grant or funding availability.

The 10-year project list in Appendix A represents the Agency’s capital projects forecast based on existing planning documents and anticipated funding sources. The

TABLE 7: FY 2020/21 TOTAL TEN-YEAR FORECAST BREAKDOWN,

Description	Year One FY 2020/21	+ Year Two FY 2021/22	+ Years 3-10 FY 2022-30	= Ten Year Total FY 2020-2030
Administrative Services (GG)	\$3.0 M	\$0.3 M	\$ 7.0 M	\$ 10.3 M
Non-Reclaimable Wastewater (NC)	\$4 .0 M	\$3.6 M	\$24.5 M	\$32.2 M
Regional Capital Improvement (RC)	\$ 98.6 M	\$164.5 M	\$414.7 M	\$678.0 M
Regional Operations & Maintenance (RO)	\$39.9 M	\$10.2 M	\$55.6 M	\$ 105.7 M
Recharge Water (RW)	\$ 14.2M	\$3.0 M	\$4.0 M	\$21.2 M
Recycled Water (WC)	\$ 3.6 M	\$5.5 M	\$51.8 M	\$60.9 M
Water Resources (WW)	\$ 3.5 M	\$3.6 M	\$5.3 M	\$12.4 M
<b>TOTAL</b>	<b>\$ 166.9 M</b>	<b>\$ 190.6 M</b>	<b>\$ 563.1 M</b>	<b>\$920.7 M</b>

\*All values rounded, exact numbers can be found in TYF 20/21 Project List (Appendix A)

list will be updated regularly as facility needs are reprioritized. An estimated ten-year budget for capital project by fund is summarized in Table 7. A full list of non-capitalized projects are listed in Appendix B. Projects associated with the IERCA are listed in Appendix C. Projects that will only move forward if grant funding is made available are listed in Appendix D.

## **REGIONAL WASTEWATER FACILITIES**

### **RP-1 (Northern Service Area) TYF Projects**

Major projects in the next ten years include the design and construction of both liquid and solids treatment capacity recovery expansions, starting in 2026/2027. Other projects include the design of an advanced water purification facility, flare improvements, and other mechanical upgrades including energy recovery.

### **RP-4 (Northern Service Area) TYF Projects**

Major projects in the next ten years include various process improvements, primary clarifier rehab, contact basin cover repairs, and influent screen replacement. A major expansion of RP-4 is expected to be completed before 2040.

### **CCWRF (Southern Service Area) TYF Projects**

Major projects in the next ten years include asset management projects, automatic valve upgrades, and filter level sensor replacements. There are currently no major expansion projects planned for CCWRF in the next 30 years.

### **RP-2 (Southern Service Area) TYF Projects**

The only project planned for RP-2 is a security upgrade. Beyond ten years, there will be a major project to fully decommission RP-2 prior to the end of the lease period in 2035.

### **RP-5 (Southern Service Area) TYF Projects**

Major projects in the next ten years include expansion of the liquids processing to 30MGD and the construction of a solids handling facility. The solids handling facility will allow RP-5 to take over the capacity currently being handled by RP-2 before RP-2 is decommissioned.

## **IERCF TYF Projects**

Projects associated with IERCF have their own funding as outlined in the Joint Powers Agreement between the Agency and SDLAC. Projects include the improvement of the current fire sprinkler system and the replacement of existing front end loaders. A complete list of IERCF projects can be found in Appendix C. Any capital maintenance, enhancement, or replacement projects will be jointly analyzed and determined with the SDLAC.

## **SALINITY MANAGEMENT TYF PROJECTS**

The Chino Basin Desalter I facility is managed by the CDA and thus there are no IEUA capital projects associated with the Desalter. Other NRWS projects include manhole upgrades, pipeline relining, and lift station upgrades.

## **RECYCLED WATER TYF PROJECTS**

Regional recycled water distribution projects are largely focused on capacity improvements and operational upgrades. Capacity improvements include the RP-1 1158 pump station upgrade, Baseline pipeline extension, and projects that help maximize operational flexibility to meet seasonal variation in direct use and groundwater recharge demands. Project prioritization is based on the ability of projects to increase recycled water deliveries and decrease unit costs. Projects that are listed were identified in the Recycled Water Implementation Plan, Recycled Water Program Strategy, Chino Basin Recharge Master Plan Update, the Agency's Asset Management Plan, and by review of use projections from Contracting Agencies. These projects will enable the region to beneficially maximize the reuse of the region's projected recycled water supply.

## **GROUNDWATER RECHARGE TYF PROJECTS**

The Agency, CBWM, CBWCD, and their respective member agencies completed the 2013 Recharge Master Plan Update (Update) to the 2010 Recharge Master Plan. The Update evaluated 27 yield enhancing capital projects for the Chino Basin. In 2017 CBWM and IEUA approved to implement recharge improvements as part of the Update for the following basins: Wineville Basin, Jurupa Basin, Victoria Basin, Lower Day Basin, and Montclair Basin. The new improvements will also include a new stormwater distribution system between Wineville and Jurupa to convey additional



stormwater runoff to multiple basins for recharge. Design of this project started in 2017, and construction started in 2018, with an expected completion to occur sometime in 2020. All groundwater recharge projects are cost shared with CBWM. See Appendix A for the capital project list.

## **ADDITIONAL REGIONAL PROGRAMS & FACILITIES**

### **Water Resources TYF Projects**

The only capital project funded through water resources is the Preliminary Design Report feasibility evaluation of the Chino Basin Program. Project components listed in the Chino Basin Program include long-range regional master plan projects that will enhance resiliency and anticipated future water supply challenges including: an advanced water purification facility and wellhead treatment to address water quality concerns; and pipelines and interties to maximize regional flexibility and provide redundancy for the Rialto Feeder. The Chino Basin Program feasibility study will be used to create a final report including a refined scope, the basis for an environmental determination, and to identify necessary institutional agreements. This feasibility study will assist with on-going discussions to determine if it is in the region's best interest to secure the \$206.7 million funding agreement from the California Water Commission with water exchange stipulations, or if the region should fund the program locally and phase in the project components.

### **Headquarters & Chino Creek Wetlands & Education Park TYF Projects**

Capital projects at the Agency headquarters and Chino Creek Wetlands include the improvement to current driveways leading into the headquarters building.

### **Laboratory TYF Projects**

Capital projects at the lab include the addition of liquid chromatography-mass spectrometry equipment for PFAS Testing.

### **Renewable Energy TYF Projects**

Renewable Energy capital projects include the purchase of existing solar panels currently on a power purchase agreement and the addition of more photovoltaic power at Agency headquarters.

## Business Network And Process Automation Control Network TYF Projects

Current capital projects include the installation of the SCADA Enterprise System.

CAPITAL IMPROVEMENT PROJECTS

Attachment: City of Chino Appeal Request Form and Supporting Documentation (Appeal of the Draft RHNA Allocation for the City of Chino)

# Abbreviations

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<b>4R</b>	Repair, Relocation, Reconstruction, and Rehabilitation
<b>AFY</b>	Acre-Feet of Water per Year
<b>AMP</b>	Asset Management Plan
<b>ARRA</b>	American Recovery Rehabilitation Act
<b>BIP</b>	Base Interruptible Program
<b>BCU</b>	Baseline Capacity Units
<b>BMPTF</b>	Basin Monitoring Program Task Force
<b>CASA</b>	California Association of Sanitation Districts
<b>CBFIP</b>	Chino Basin Facilities Improvement Project
<b>CBWCD</b>	Chino Basin Water Conservation District
<b>CBWM</b>	Chino Basin Watermaster
<b>CCRA</b>	Capital Capacity Reimbursement Account
<b>CCTV</b>	Closed Circuit Television
<b>CCWRF</b>	Carbon Canyon Wastewater Recycling Facility
<b>CDA</b>	Chino Basin Desalter Authority
<b>CEC</b>	California Energy Commission
<b>CEQA</b>	California Environmental Quality Act
<b>CH4</b>	Methane
<b>CO2</b>	Carbon Dioxide

<b>CO2-eq</b>	CO2 Equivalent
<b>CPUC</b>	California Public Utilities Commission
<b>CSI</b>	California Solar Incentive
<b>CUWCC</b>	California Urban Water Conservation Council
<b>CVWD</b>	Cucamonga Valley Water District
<b>DA</b>	Direct Access
<b>DCS</b>	Distribution Control System
<b>DR</b>	Demand Response
<b>DWR</b>	Department of Water Resources
<b>DYY</b>	Dry Year Yield
<b>EDU</b>	Equivalent Dwelling Unit
<b>ESP</b>	Electricity Service Provider
<b>FMP</b>	Facilities Master Plan
<b>FSL</b>	Firm Service Level
<b>FY</b>	Fiscal Year
<b>GG</b>	Administrative Services Program
<b>GPD</b>	Gallons per Day
<b>GPS</b>	Global Positioning System
<b>GWP</b>	Global Warming Potential
<b>H2S</b>	Hydrogen Sulfide
<b>HFC</b>	Hydrofluorocarbon
<b>HVAC</b>	Heating/Ventilation/Air Conditioning
<b>ICE</b>	Internal Combustion Engine

## ABBREVIATIONS

<b>IE</b>	Inland Empire
<b>IERCF</b>	Inland Empire Regional Composting Facility
<b>IEUA</b>	Inland Empire Utilities Agency
<b>IRP</b>	Integrated Resource Plan
<b>KPI</b>	Key Performance Indicators
<b>KW</b>	Kilowatt
<b>LOC</b>	Lewis Operating Company
<b>LOS</b>	Level of Service
<b>MACR</b>	Modified Accelerated Cost-Recovery
<b>mg/L</b>	Milligrams per liter
<b>MGD</b>	Million Gallons per Day
<b>MW</b>	Megawatts
<b>MG</b>	Million Gallons
<b>MWH</b>	Megawatt Hours
<b>MOU</b>	Memorandum of Understanding
<b>MVWD</b>	Monte Vista Water District
<b>MWD</b>	Metropolitan Water District of Southern California
<b>N2O</b>	Nitrous Oxide
<b>NC</b>	Non-Reclaimable Wastewater Program Capital Fund
<b>NEM</b>	Net Energy Metering
<b>NPDES</b>	National Pollutant Discharge Elimination System
<b>NRW</b>	Non-Reclaimable Wastewater
<b>NRWS</b>	Non-Reclaimable Wastewater System

<b>O&amp;M</b>	Operations & Maintenance
<b>OBMP</b>	Optimum Basin Management Plan
<b>OBMP</b>	Optimum Basin Management Plan
<b>OCSD</b>	Orange County Sanitation District
<b>OWOW</b>	One Water One Watershed
<b>PPA</b>	Power Purchase Agreement
<b>PFC</b>	Perfluorocarbon
<b>PEIR</b>	Program Environmental Impact Report
<b>RC</b>	Regional Capital Improvement (Wastewater) Fund
<b>RCA</b>	Regional Composting Authority
<b>RDA</b>	Redevelopment Agency
<b>REC</b>	Renewable Energy Credit
<b>RO</b>	Regional Operations and Maintenance (Wastewater) Fund
<b>RP-1</b>	Regional Plant No.1 in the City of Ontario
<b>RP-2</b>	Regional Plant No.2 in the City of Chino
<b>RP-4</b>	Regional Plant No.4 in the City of Rancho Cucamonga
<b>RP-5</b>	Regional Plant No.5 in the City of Chino
<b>R&amp;R</b>	Repair and Replacement
<b>RW</b>	Groundwater Recharge Fund
<b>RWC</b>	Recycled Water Contribution
<b>RWRP</b>	Regional Water Recycling Plants
<b>RWQCB</b>	Regional Water Quality Control Board
<b>SAWA</b>	Santa Ana Watershed Association

## ABBREVIATIONS

<b>SAWPA</b>	Santa Ana Watershed Project Authority
<b>SBCFCD</b>	San Bernardino County Flood Control District
<b>SCADA</b>	Supervisory Control and Data Acquisition
<b>SCAP</b>	Southern California Alliance of Publicly-Owned Treatment Works
<b>SCAQMD</b>	South Coast Air Quality Management District
<b>SCE</b>	Southern California Edison
<b>SDLAC</b>	County Sanitation Districts of Los Angeles County
<b>SF6</b>	Sulfur Hexafluoride
<b>SGIP</b>	Self-Generation Incentive Program
<b>SHF</b>	RP-5 Solids Handling Facility
<b>SRF</b>	State Revolving Fund
<b>SWRCB</b>	State Water Resources Control Board
<b>TA&amp;TI</b>	Technical Assistance and Technology Incentives
<b>TDS</b>	Total Dissolved Solids
<b>TIN</b>	Total Inorganic Nitrogen
<b>TOU-BIP</b>	Time-of-Use Base Interruptible Program
<b>TYF</b>	Ten-Year Forecast
<b>UPC</b>	Unit Production Cost
<b>USBR</b>	United States Bureau of Reclamation
<b>UWMP</b>	Urban Water Management Plan
<b>VFD</b>	Variable Frequency Drives
<b>WC</b>	Recycled Water Program Fund
<b>WFMP</b>	Wastewater Facilities Master Plan



**WSAP** Water Supply Allocation Plan  
**WUE** Water Use Efficiency

# ABBREVIATIONS

Attachment: City of Chino Appeal Request Form and Supporting Documentation (Appeal of the Draft RHNA Allocation for the City of Chino)

# Appendix A

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## Proposed Capital Project List

# Appendix A

## Proposed Capital Project List

ID #	Project #	Project Name	Fund	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	10 Year Total	PAYGO %	GRANT %	DEBT %	OUTSIDE %
1	EN22010	GG Asset Managment Project	GG	\$ -	\$ 50,000	\$ 50,000	\$ 50,000	\$ 300,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 5,450,000	100%	0%	0%	0%
2	EP21004	Agency Wide Vehicle Replacement	GG	\$ 150,000	\$ 154,500	\$ 159,135	\$ 163,909	\$ 168,826	\$ 173,891	\$ 179,108	\$ 184,481	\$ 190,015	\$ 195,715	\$ 1,719,580	100%	0%	0%	0%
3	FP10200	Financial Planning Project LRP	GG	\$ 1,275,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,275,000	100%	0%	0%	0%
4	FM20005	Agency Wide HVAC Replacements	GG	\$ 250,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 550,000	100%	0%	0%	0%
5	LB21001	LCMSMS for PFAS and CEC Testing	GG	\$ 400,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 400,000	100%	0%	0%	0%
6	EN20040	HQ Driveway Improvements	GG	\$ 335,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 335,000	100%	0%	0%	0%
7	IS21006	Replace RP1 Trailer	GG	\$ 200,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 200,000	0%	0%	100%	0%
8	EN21049	Main HDQ Improvements Office Addition	GG	\$ 140,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 140,000	100%	0%	0%	0%
9	IS20003	BIZ Infrastructure Replacement Project	GG	\$ 110,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 110,000	100%	0%	0%	0%
10	IS21001	BIZ Microwave Upgrade Phase II	GG	\$ 70,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 70,000	100%	0%	0%	0%
11	IS20006	BIZ New Workstations	GG	\$ 20,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 20,000	100%	0%	0%	0%
<b>GG Total</b>				\$ 2,950,000	\$ 304,500	\$ 309,135	\$ 313,909	\$ 468,826	\$ 1,173,891	\$ 1,179,108	\$ 1,184,481	\$ 1,190,015	\$ 1,195,715	\$ 10,269,580				

ID #	Project #	Project Name	Fund	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	10 Year Total	PAYGO %	GRANT %	DEBT %	OUTSIDE %
12	EN23002	Philadelphia Lift Station Force Main Imp	NC	\$ 250,000	\$ 1,000,000	\$ 15,000,000	\$ 3,450,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 19,700,000	100%	0%	0%	0%
13	EN22007	NRW Asset Management Projects	NC	\$ -	\$ -	\$ -	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 3,500,000	100%	0%	0%	0%
14	EN22020	Philadelphia Lift Station Pump Upgrades	NC	\$ -	\$ 1,700,000	\$ 800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,500,000	100%	0%	0%	0%
15	EN22002	NRW East End Flowmeter Replacement	NC	\$ 2,300,000	\$ 100,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,400,000	100%	0%	0%	0%
16	EN21014	NRWS Manhole Upgrades - 20/21	NC	\$ 200,000	\$ 200,000	\$ 200,000	\$ 200,000	\$ 200,000	\$ 200,000	\$ 200,000	\$ 200,000	\$ 200,000	\$ 200,000	\$ 2,000,000	100%	0%	0%	0%
17	EN19027	NRW Pipeline Relining Along Cucamonga Cr	NC	\$ 1,335,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,335,000	100%	0%	0%	0%
18	EN15044	SBCFCD NRW Easement	NC	\$ -	\$ 550,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 550,000	100%	0%	0%	0%
19	EN26020	Lift Station AMP Projects	NC	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 200,000	\$ -	\$ -	\$ -	\$ -	\$ 200,000	100%	0%	0%	0%
<b>NC Total</b>				\$ 4,085,000	\$ 3,550,000	\$ 16,000,000	\$ 4,150,000	\$ 700,000	\$ 900,000	\$ 700,000	\$ 700,000	\$ 700,000	\$ 700,000	\$ 32,185,000				

ID #	Project #	Project Name	Fund	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	10 Year Total	PAYGO %	GRANT %	DEBT %	OUTSIDE %
20	EN19006	RP-5 Biosolids Facility	RC	\$ 55,345,979	\$ 91,364,549	\$ 40,345,368	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 187,055,896	19%	35%	46%	0%
21	EN19001	RP-5 Expansion to 30 mgd	RC	\$ 31,711,330	\$ 65,146,725	\$ 62,906,035	\$ 24,350,634	\$ 236,286	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 184,351,010	100%	0%	0%	0%
22	EN24001	RP-1 Liquid Treatment Capacity Recovery	RC	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,500,000	\$ 4,750,000	\$ 57,000,000	\$ 105,000,000	\$ 169,250,000	100%	0%	0%	0%
23	EN22006	RC Asset Management	RC	\$ -	\$ 250,000	\$ 250,000	\$ 250,000	\$ 2,400,000	\$ 8,000,000	\$ 8,000,000	\$ 8,000,000	\$ 8,000,000	\$ 8,000,000	\$ 43,150,000	100%	0%	0%	0%
24	EN24002	RP-1 Solids Treatment Expansion	RC	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 750,000	\$ 1,250,000	\$ 14,000,000	\$ 26,000,000	\$ 42,000,000	100%	0%	0%	0%
25	EN17006	CCWRF Asset Management and Improvements	RC	\$ 1,500,000	\$ 2,000,000	\$ 8,000,000	\$ 3,500,000	\$ 650,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 15,650,000	100%	0%	0%	0%
26	EN11039	RP-1 Disinfection Pump Improvements	RC	\$ -	\$ -	\$ -	\$ 150,000	\$ 2,400,000	\$ 4,660,000	\$ 250,000	\$ -	\$ -	\$ -	\$ 7,460,000	100%	0%	0%	0%
27	EN21045	Montclair Force Main Improvements	RC	\$ 500,000	\$ 4,500,000	\$ 1,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000	100%	0%	0%	0%

28	EN18006	RP-1 Flare Improvements	RC	\$ 4,500,000	\$ 500,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5,000,000	100%	0%	0%	0%
29	EN21015	Collection System Upgrades 20/21	RC	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 5,000,000	100%	0%	0%	0%
30	EN19025	Regional Force Main Improvements	RC	\$ 3,500,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,500,000	100%	0%	0%	0%
31	PL19001	Purchase Existing Solar Installation	RC	\$ -	\$ -	\$ -	\$ -	\$ 3,500,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,500,000	100%	0%	0%	0%
32	EN22022	RP-1 Air Compressor Upgrades	RC	\$ -	\$ 250,000	\$ 1,500,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,750,000	100%	0%	0%	0%
33	EN18036	CCWRF Asset Mgmt and Imprvmt Pkg. III	RC	\$ 500,000	\$ -	\$ 200,000	\$ 500,000	\$ 300,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,500,000	100%	0%	0%	0%
34	PL17002	HQ Solar Photovoltaic Power Plants Ph. 2	RC	\$ -	\$ -	\$ 300,000	\$ 1,100,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,400,000	100%	0%	0%	0%
35	EN14019	RP-1 Headworks Primary & Secondary Upg	RC	\$ 450,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 450,000	100%	0%	0%	0%
36	IS20004	WW Cybersecurity Projects	RC	\$ 80,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 80,000	100%	0%	0%	0%
37	IS21003	Wireless Manager Software Replacement	RC	\$ 30,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 30,000	100%	0%	0%	0%
38	IS21004	Secure Access for RP-2	RC	\$ 20,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 20,000	100%	0%	0%	0%
39	IS20005	WW Infrastructure Replacement Project	RC	\$ 8,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8,000	100%	0%	0%	0%
<b>RC Total</b>				\$ 98,645,309	\$ 164,511,274	\$ 115,801,403	\$ 30,350,634	\$ 9,986,286	\$ 13,160,000	\$ 12,000,000	\$ 14,500,000	\$ 79,500,000	\$ 139,500,000	\$ 677,954,906					

ID #	Project #	Project Name	Fund	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	10 Year Total	PAYGO %	GRANT %	DEBT %	OUTSIDE %
40	EN17110	RP-4 Process Improvements	RO	\$ 12,500,000	\$ 2,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 14,500,000	100%	0%	0%	0%
41	PL26001	Advanced Water Purification Facility	RO	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5,000,000	\$ 5,000,000	\$ 10,000,000	100%	0%	0%	0%
42	EN18025	RP-1 Secondary System Rehabilitation	RO	\$ -	\$ -	\$ -	\$ 250,000	\$ 1,100,000	\$ 1,950,000	\$ 2,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 8,300,000	100%	0%	0%	0%
43	EN20057	RP-4 Process Improvements Phase II	RO	\$ -	\$ -	\$ 500,000	\$ 4,000,000	\$ 3,500,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8,000,000	100%	0%	0%	0%
44	EN13016	SCADA Enterprise System	RO	\$ 3,000,000	\$ 3,000,000	\$ 1,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 7,000,000	35%	65%	0%	0%
45	EP21003	South Major Facilities Repair/Replacemnt	RO	\$ 600,000	\$ 600,000	\$ 600,000	\$ 600,000	\$ 600,000	\$ 700,000	\$ 700,000	\$ 700,000	\$ 700,000	\$ 700,000	\$ 6,500,000	100%	0%	0%	0%
46	EP21002	North Major Facilities Repair/Replacemnt	RO	\$ 600,000	\$ 600,000	\$ 600,000	\$ 600,000	\$ 600,000	\$ 700,000	\$ 700,000	\$ 700,000	\$ 700,000	\$ 700,000	\$ 6,500,000	100%	0%	0%	0%
47	EN20056	RSS Haven Avenue Repairs	RO	\$ 5,751,606	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5,751,606	100%	0%	0%	0%
48	EN22005	RO Asset Management	RO	\$ -	\$ 50,000	\$ 50,000	\$ 50,000	\$ 300,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 5,450,000	100%	0%	0%	0%
49	EN17043	RP4 Primary Clarifier Rehab	RO	\$ 4,500,000	\$ 500,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5,000,000	100%	0%	0%	0%
50	EN17082	Mechanical Restoration and Upgrades	RO	\$ 4,300,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,300,000	100%	0%	0%	0%
51	EN17042	Digester 6 and 7 Roof Repairs	RO	\$ 2,800,000	\$ 200,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,000,000	50%	0%	0%	50%
52	EN22031	RP-1 Influent Pump Station Electrical Improvements	RO	\$ -	\$ 500,000	\$ 1,700,000	\$ 800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,000,000	100%	0%	0%	0%
53	EN22025	RP-1 Dump Station	RO	\$ -	\$ 64,000	\$ 95,400	\$ 1,855,600	\$ 106,100	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,121,100	100%	0%	0%	0%
54	EN20051	RP-1 MCB and Old Lab Building Rehab	RO	\$ 320,000	\$ 1,200,000	\$ 80,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,600,000	100%	0%	0%	0%
55	EN23020	RP-1 Solids Heat Exchanger Replacements & Upgrades	RO	\$ -	\$ -	\$ 600,000	\$ 600,000	\$ 300,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,500,000	0%	28%	72%	0%
56	EN19010	RP-4 Influent Screen Replacement	RO	\$ 1,460,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,460,000	100%	0%	0%	0%
57	EN23024	RP-1 TP-1 Stormwater Drainage Upgrades	RO	\$ -	\$ -	\$ 250,000	\$ 1,000,000	\$ 50,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,300,000	100%	0%	0%	0%
58	EN22027	RP-1 Repurpose Lab	RO	\$ -	\$ 110,000	\$ 930,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,040,000	100%	0%	0%	0%

59	EN22030	Replace Anoxic Mixers with Energy Efficient System	RO	\$ -	\$ 60,000	\$ 780,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 840,000	100%	0%	0%	0%
60	EN21040	RP-1 Solids Hot Water Loop Valves	RO	\$ 250,000	\$ 560,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 810,000	100%	0%	0%	0%
61	EN21053	RP-1 Old Effluent Structure Rehabilitation	RO	\$ 15,000	\$ 55,000	\$ 560,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 630,000	100%	0%	0%	0%
62	EN20044	RP-1 Plant 3 Primary Cover Replacement	RO	\$ -	\$ -	\$ 200,000	\$ 400,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 600,000	100%	0%	0%	0%
63	EN20041	RP-1 TP-1 Bleach Mixing Repairs	RO	\$ 586,725	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 586,725	100%	0%	0%	0%
64	EN15012	RP-1 Primary Effluent Conveyance Improve	RO	\$ 550,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 550,000	100%	0%	0%	0%
65	EN20058	RP-1 TP-1 Waste Wash Water Basin Pumps R	RO	\$ 510,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 510,000	100%	0%	0%	0%
66	EN26021	Regional Conveyance AMP	RO	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 500,000	\$ -	\$ -	\$ -	\$ -	\$ 500,000	100%	0%	0%	0%
67	EN24020	RP-1 Dewatering Centrate Pumps	RO	\$ -	\$ -	\$ -	\$ 95,000	\$ 330,000	\$ 75,000	\$ -	\$ -	\$ -	\$ -	\$ 500,000	53%	47%	0%	0%
68	EN21042	RP-1 East Influent Gate Replacement	RO	\$ 450,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 450,000	100%	0%	0%	0%
69	EN27001	RP-1 Equalization Basin #1 Access Ramp	RO	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 35,000	\$ 106,500	\$ 300,000	\$ -	\$ 441,500	100%	0%	0%	0%
70	EN21046	CCWRF Filter Automatic Valves	RO	\$ 388,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 388,000	100%	0%	0%	0%
71	EN21054	CCWRF Filter Level Sensor Replacement	RO	\$ 388,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 388,000	100%	0%	0%	0%
72	EN21047	RP-5 Bar Screen Inlet Gate Primary Actuators Replacement	RO	\$ 370,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 370,000	100%	0%	0%	0%
73	EN21044	RP-1 Dewatering Centrate and Drainage Valves (MOV)	RO	\$ 50,000	\$ 270,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 320,000	100%	0%	0%	0%
74	EN21056	RP-1 Evaporative Cooling for Aeration Blower Building	RO	\$ -	\$ 300,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 300,000	100%	0%	0%	0%
75	EN20037	Agency Wide Chemical Containment Coating	RO	\$ 252,625	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 252,625	0%	0%	100%	0%
76	EN25020	RP-1 Digester Cleaning Lagoon (DCL) Lining	RO	\$ -	\$ -	\$ -	\$ -	\$ 200,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 200,000	95%	5%	0%	0%
77	EN19009	RP-1 Energy Recovery	RO	\$ 200,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 200,000	100%	0%	0%	0%
78	EN20045	RP-1 TP-1 Level Sensor Replacement	RO	\$ -	\$ -	\$ 200,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 200,000	100%	0%	0%	0%
79	EN23022	RP-1 Solids Sludge Recirculating Pump Upgrades	RO	\$ -	\$ -	\$ 80,000	\$ 105,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 185,000	26%	35%	0%	39%
80	EN22021	RP-1 Digester Area Utility Water (UW) Line Replacement	RO	\$ -	\$ 100,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 100,000	100%	0%	0%	0%
81	IS20007	Control System Ent Historian Enhancement	RO	\$ 45,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 45,000	100%	0%	0%	0%
<b>RO Total</b>				\$ 39,886,956	\$ 10,169,000	\$ 8,225,400	\$ 10,355,600	\$ 7,086,100	\$ 4,925,000	\$ 4,435,000	\$ 3,506,500	\$ 8,700,000	\$ 8,400,000	\$ 105,689,556				

ID #	Project #	Project Name	Fund	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	10 Year Total	PAYGO %	GRANT %	DEBT %	OUTSIDE %	
82	RW15003	Recharge Master Plan Update	RW	\$ 11,500,000	\$ 3,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 14,500,000	100%	0%	0%	0%	
83	EN22008	GWR Asset Managment Project	RW	\$ -	\$ -	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 4,000,000	100%	0%	0%	0%	
84	RW15004	Lower Day Basin Improvements (RMPU PID 1	RW	\$ 2,375,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,375,000	100%	0%	0%	0%	
85	EN21057	Recharge Basin Clean-up of Illegally Dumped Materials	RW	\$ 298,950	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 298,950	100%	0%	0%	0%	
86	IS21008	GWR Infrastructure Replacement Project	RW	\$ 30,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 30,000	100%	0%	0%	0%	
<b>RW Total</b>				\$ 14,203,950	\$ 3,000,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 21,203,950				

ID #	Project #	Project Name	Fund	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	10 Year Total	PAYGO %	GRANT %	DEBT %	OUTSIDE %
87	EN22009	WC Asset Management Project	WC	\$ -	\$ 500,000	\$ 1,000,000	\$ 2,000,000	\$ 3,000,000	\$ 5,000,000	\$ 7,000,000	\$ 8,900,000	\$ 8,900,000	\$ 8,900,000	\$ 45,200,000	100%	0%	0%	0%
88	EN09007	1630 E Pipeline Seg B & 1630 E Reservoir	WC	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,000,000	\$ 2,400,000	\$ 3,000,000	\$ -	\$ -	\$ 6,400,000	100%	0%	0%	0%
89	EN21041	RP-4 Contact Basin Cover Repair & RW Wet Well Passive Overflow Improvements	WC	\$ 350,000	\$ 3,500,000	\$ 70,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,920,000	100%	0%	0%	0%
90	EN22004	1158 East Reservoir Re-coating/painting	WC	\$ 1,550,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,550,000	100%	0%	0%	0%
91	EN20055	CCWRF Tertiary Panel Rebuild	WC	\$ 60,000	\$ 600,000	\$ 525,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,185,000	100%	0%	0%	0%
92	EN21050	8th Street RW Turnout Connection to the 1630 W Pipeline	WC	\$ 350,000	\$ 485,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 835,000	100%	0%	0%	0%
93	EN14042	1158 RWPS Upgrades	WC	\$ 500,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 500,000	19%	35%	46%	0%
94	EN22023	Prado Dechlor Sump Pump Replacement	WC	\$ -	\$ 360,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 360,000	100%	0%	0%	0%
95	EN17041	Orchard Recycled Water Turnout Improve	WC	\$ 310,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 310,000	11%	17%	72%	0%
96	EN15043	SBCFCD Recycled Water Easement	WC	\$ 250,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 250,000	0%	1%	100%	0%
97	EN15002	1158 Reservoir Site Cleanup	WC	\$ 200,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 200,000	19%	35%	46%	0%
98	EN20022	1299 Reservoir Paint/Coating Repairs and	WC	\$ -	\$ 100,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 100,000	100%	0%	0%	0%
99	EN24005	1630 West Reservoir Paint/Coating Repair	WC	\$ -	\$ -	\$ 75,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 75,000	100%	0%	0%	0%
100	EN24006	930 Reservoir Paint/Coating Repairs and	WC	\$ -	\$ -	\$ -	\$ 75,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 75,000	100%	0%	0%	0%
<b>WC Total</b>				\$ 3,570,000	\$ 5,545,000	\$ 1,670,000	\$ 2,075,000	\$ 3,000,000	\$ 6,000,000	\$ 9,400,000	\$ 11,900,000	\$ 8,900,000	\$ 8,900,000	\$ 60,960,000				

ID #	Project #	Project Name	Fund	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	10 Year Total	PAYGO %	GRANT %	DEBT %	OUTSIDE %
101	PL19005	Chino Basin Program	WW	\$ 3,542,950	\$ 3,542,950	\$ 5,307,689	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 12,393,589	100%	0%	0%	0%
<b>WW Total</b>				\$ 3,542,950	\$ 3,542,950	\$ 5,307,689	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 12,393,589				

**Capital Project List Grand Total**      \$ 166,884,165   \$ 190,622,724   \$ 147,813,627   \$ 47,745,143   \$ 21,741,212   \$ 26,658,891   \$ 28,214,108   \$ 32,290,981   \$ 99,490,015   \$ 159,195,715   \$ 920,656,581

# Appendix B

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## Proposed Non-Capital Project List

# Appendix B

## Proposed Non-Capital Project List

ID #	Project #	Project Name	Fund	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	10 Year Total	PAYGO %	GRANT %	DEBT %	OUTSIDE %
102	FM21002	Agency Wide Roofing	GG	\$ 1,780,000	\$ 1,050,000	\$ 1,050,000	\$ 630,000	\$ 575,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5,085,000	50%	50%	0%	0%
103	FM20001	HQ Interior Replacements	GG	\$ -	\$ -	\$ 800,000	\$ 1,680,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,480,000	100%	0%	0%	0%
104	FM21003	Agency Wide Facilities Rehab & Repairs	GG	\$ 51,500	\$ 53,045	\$ 54,636	\$ 56,275	\$ 57,964	\$ 59,703	\$ 61,494	\$ 63,339	\$ 65,239	\$ -	\$ 523,195	100%	0%	0%	0%
105	EN20008	HQ Parking Lot FY19/20	GG	\$ 380,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 380,000	100%	0%	0%	0%
106	IS20015	SAP Roadmap & Strategy	GG	\$ 200,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 200,000	100%	0%	0%	0%
107	IS20020	ERP Readiness Assessment	GG	\$ 150,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 150,000	75%	25%	0%	0%
108	IS21002	BIZ Cybersecurity Project	GG	\$ 140,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 140,000	50%	0%	0%	50%
109	IS20014	Technology Master Plan	GG	\$ 100,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 100,000	100%	0%	0%	0%
<b>GG Total</b>				\$ 2,801,500	\$ 1,103,045	\$ 1,904,636	\$ 2,366,275	\$ 632,964	\$ 59,703	\$ 61,494	\$ 63,339	\$ 65,239	\$ -	\$ 9,058,195				

ID #	Project #	Project Name	Fund	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	10 Year Total	PAYGO %	GRANT %	DEBT %	OUTSIDE %
110	EN21016	NRWS Emergency O&M Projects FY 20/21	NC	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 1,000,000	100%	0%	0%	0%
111	PL21002	NRWS Rate Study	NC	\$ 200,000	\$ 200,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 400,000	60%	0%	0%	40%
112	EN19028	NRW Man Hole and Pipeline Condition Asse	NC	\$ -	\$ 250,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 250,000	100%	0%	0%	0%
<b>NC Total</b>				\$ 300,000	\$ 550,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 1,650,000				

ID #	Project #	Project Name	Fund	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	10 Year Total	PAYGO %	GRANT %	DEBT %	OUTSIDE %
113	EN22024	RP-1 Digester Cleaning Service Contract	RO	\$ -	\$ 1,000,000	\$ 2,000,000	\$ 1,000,000	\$ 2,000,000	\$ 1,000,000	\$ 2,000,000	\$ 1,000,000	\$ 2,000,000	\$ 3,000,000	\$ 15,000,000	100%	0%	0%	0%
114	EN21019	RO Emergency O&M Projects FY 20/21	RO	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 5,000,000	100%	0%	0%	0%
115	EN21034	RO On-Call/Small Projects FY 20/21	RO	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 5,000,000	100%	0%	0%	0%
116	EN21035	RO Safety Operations and Maintenance Pro	RO	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 5,000,000	100%	0%	0%	0%
117	PA17006	Agency-Wide Aeration	RO	\$ -	\$ -	\$ 500,000	\$ 1,200,000	\$ 2,500,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,200,000	100%	0%	0%	0%
118	PA21003	Agency Wide Paving	RO	\$ 260,000	\$ 800,000	\$ 800,000	\$ 800,000	\$ 1,150,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,810,000	100%	0%	0%	0%
119	EN16021	TCE Plume Cleanup	RO	\$ 3,793,979	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,793,979	100%	0%	0%	0%
120	EN19024	Regional System Asset Management (Assess	RO	\$ 3,100,000	\$ 100,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,200,000	100%	0%	0%	0%
121	EN26025	RP2-Preliminary Design Report for Decomm	RO	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 600,000	\$ 1,100,000	\$ 1,500,000	\$ 3,200,000	100%	0%	0%	0%
122	PA21002	Agency Wide Coatings	RO	\$ 750,000	\$ 50,000	\$ 50,000	\$ 150,000	\$ 388,810	\$ 445,975	\$ 353,354	\$ 260,955	\$ -	\$ -	\$ 2,449,094	100%	0%	0%	0%
123	PL21007	RO Planning Documents	RO	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 1,500,000	100%	0%	0%	0%
124	EN19023	Asset Management Planning Document	RO	\$ 1,100,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,100,000	100%	0%	0%	0%
125	EN20043	RP-1 Pipe Gallery Staircase Evaluation	RO	\$ -	\$ -	\$ -	\$ 650,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 650,000	100%	0%	0%	0%
126	EN23021	Agency-Wide Infiltration and Inflow Study	RO	\$ -	\$ -	\$ 300,000	\$ 300,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 600,000	50%	0%	0%	50%
127	PL21001	Flow & Loading Supplemental Study	RO	\$ 300,000	\$ 300,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 600,000	100%	0%	0%	0%

Attachment: City of Chino Appeal Request Form and Supporting Documentation (Appeal of the Draft RHNA Allocation for the City of Chino)



128	EN23023	RP-1 Daft Pavement Improvements	RO	\$ -	\$ -	\$ 20,000	\$ 510,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 530,000	100%	0%	0%
129	EN21055	RP-1 Blower Lamella Silencers Upgrades	RO	\$ 300,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 300,000	100%	0%	0%
130	EN20038	Agency Wide Pavement Management Study	RO	\$ -	\$ 75,000	\$ -	\$ 75,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 150,000	0%	0%	100%
131	PL19002	Regional Contract Facilitation	RO	\$ 150,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 150,000	100%	0%	0%
132	EN26027	RP-1 & RP-4 Bird Deterrent Systems	RO	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 100,000	\$ -	\$ -	\$ -	\$ -	\$ 100,000	100%	0%	0%
133	PL17004	Wastewater Flow and Loading Study	RO	\$ 100,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 100,000	100%	0%	0%
134	IS21005	Upgrade Carbon Canyon to Plant Pax 4.5	RO	\$ 75,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 75,000	100%	0%	0%
135	IS21007	WW Cybersecurity Assessment	RO	\$ 75,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 75,000	0%	0%	100%
136	EN22029	RP-1 Repurpose Lab Assessment	RO	\$ 50,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 50,000	100%	0%	0%
137	EN22032	RP-1 TP-1 Stormwater Drainage Upgrades Assessment	RO	\$ -	\$ 50,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 50,000	0%	0%	10%
138	EN21052	RP-1 Evaporative Cooling for Aeration Blower Building Study	RO	\$ 40,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 40,000	100%	0%	0%
139	PL17001	RO Planning Documents	RO	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	100%	0%	0%
<b>RO Total</b>				\$ 11,743,979	\$ 4,025,000	\$ 5,320,000	\$ 6,335,000	\$ 7,688,810	\$ 3,195,975	\$ 4,003,354	\$ 3,510,955	\$ 4,750,000	\$ 6,150,000	\$ 56,723,073			

ID #	Project #	Project Name	Fund	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	10 Year Total	PAYGO %	GRANT %	DEBT %	OUTSIDE %
140	RW20001	SB88 Data Compliance Review	RW	\$ 69,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 69,000	100%	0%	0%	
<b>RW Total</b>				\$ 69,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 69,000				

ID #	Project #	Project Name	Fund	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	10 Year Total	PAYGO %	GRANT %	DEBT %	OUTSIDE %
141	EN21037	WW (Recycled Water) Planning Documents	WC	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 2,500,000	100%	0%	0%	
142	WR21029	Implementation of Upper SAP HCP-Recycled Water Benefits	WC	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 2,500,000	90%	0%	0%	10%
143	EN21017	WC Emergency O&M Projects FY 20/21	WC	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 1,500,000	100%	0%	0%	
144	EN21036	WC On-Call/Small Projects FY 20/21	WC	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000	\$ 1,500,000	100%	0%	0%	
145	EN18021	Prado Basin AMP Annual Monitoring	WC	\$ 105,000	\$ 107,500	\$ 110,000	\$ 112,500	\$ 115,000	\$ 117,500	\$ 120,000	\$ 122,500	\$ 125,000	\$ 127,500	\$ 1,162,500	100%	0%	0%	
146	WR16001	Water Softener Removal Rebate Program	WC	\$ 75,000	\$ 75,000	\$ 75,000	\$ 75,000	\$ 75,000	\$ 75,000	\$ 75,000	\$ 75,000	\$ 75,000	\$ -	\$ 675,000	100%	0%	0%	
147	EN21051	Ely Monitoring Well	WC	\$ 300,000	\$ 285,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 585,000	100%	0%	0%	
148	EN25031	Recycled Water Program Strategy 2025	WC	\$ -	\$ -	\$ -	\$ -	\$ 250,000	\$ 250,000	\$ -	\$ -	\$ -	\$ -	\$ 500,000	100%	0%	0%	
149	EN22028	Philly RW Gravity Line Abandonment	WC	\$ -	\$ 250,000	\$ 250,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 500,000	100%	0%	0%	
150	EN19030	WC Asset Management (Assessment Only)	WC	\$ -	\$ 250,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 250,000	100%	0%	0%	
151	PL18002	Basin Plan Amendment	WC	\$ 210,000	\$ 20,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 230,000	100%	0%	0%	
152	EN20031	Recycled Water Program Strategy 2020	WC	\$ 175,000	\$ 25,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 200,000	0%	0%	100%	
153	EN19051	RW Hydraulic Modeling	WC	\$ 190,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 190,000	100%	0%	0%	
154	WR20029	Upper SAR HCP & Int Model-Recy Wtr Benef	WC	\$ 85,000	\$ 85,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 170,000	100%	0%	0%	

Attachment: City of Chino Appeal Request Form and Supporting Documentation (Appeal of the Draft RHNA Allocation for the City of Chino)

155	EN20050	Reservoir Maintenance	WC	\$ -	\$ -	\$ 20,000	\$ -	\$ -	\$ 20,000	\$ -	\$ -	\$ 20,000	\$ -	\$ 60,000	100%	0%	0%	C
156	EN20049	Reservoir Maintenance	WC	\$ 50,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 50,000	100%	0%	0%	C
<b>WC Total</b>				\$ 1,990,000	\$ 1,897,500	\$ 1,255,000	\$ 987,500	\$ 1,240,000	\$ 1,262,500	\$ 995,000	\$ 997,500	\$ 1,020,000	\$ 927,500	\$ 12,572,500				

ID #	Project #	Project Name	Fund	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	10 Year Total	PAYGO %	GRANT %	DEBT %	OUTSIDE %
157	WR21027	WW (Recharged Water) Planning Documents	WW	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 2,500,000	75%	0%	0%	25%
158	WR21028	Implementation of Upper SAP HCP-Water Benefits	WW	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000	\$ 2,500,000	33%	0%	0%	67%
159	WR21006	Large Landscape Retrofit Program	WW	\$ 200,000	\$ 200,000	\$ 200,000	\$ 200,000	\$ 200,000	\$ 200,000	\$ 200,000	\$ 200,000	\$ 200,000	\$ 200,000	\$ 2,000,000	100%	0%	0%	C
160	WR21013	Sponsorships & Public Outreach Activities	WW	\$ 174,500	\$ 174,500	\$ 174,500	\$ 174,500	\$ 174,500	\$ 174,500	\$ 174,500	\$ 174,500	\$ 174,500	\$ -	\$ 1,570,500	100%	0%	0%	C
161	WR18028	Chino Basin Water Bank Planning Authority	WW	\$ 600,000	\$ 600,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,200,000	100%	0%	0%	C
162	WR21007	Residential Rebate Incentives	WW	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 1,000,000	100%	0%	0%	C
163	WR21008	CII Rebate Incentives	WW	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 1,000,000	100%	0%	0%	C
164	WR21025	Landscape Irrigation Tune-Ups	WW	\$ 200,000	\$ 200,000	\$ 200,000	\$ 200,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 800,000	100%	0%	0%	C
165	WR21021	Regional WUE Support Tools	WW	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000	\$ 730,000	100%	0%	0%	C
166	WR21009	National Theater for Children	WW	\$ 60,000	\$ 60,000	\$ 60,000	\$ 60,000	\$ 60,000	\$ 60,000	\$ 60,000	\$ 60,000	\$ 60,000	\$ 60,000	\$ 600,000	100%	0%	0%	C
167	WR21017	Residential Pressure Regulation Program	WW	\$ 300,000	\$ 300,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 600,000	100%	0%	0%	C
168	WR21004	Garden In Every School	WW	\$ 45,000	\$ 45,000	\$ 45,000	\$ 45,000	\$ 45,000	\$ 45,000	\$ 45,000	\$ 45,000	\$ 45,000	\$ 45,000	\$ 450,000	100%	0%	0%	C
169	WR16024	SARCCUP	WW	\$ 200,000	\$ 200,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 400,000	100%	0%	0%	C
170	WR21002	CBWCD Leap	WW	\$ 40,000	\$ 40,000	\$ 40,000	\$ 40,000	\$ 40,000	\$ 40,000	\$ 40,000	\$ 40,000	\$ 40,000	\$ 40,000	\$ 400,000	100%	0%	0%	C
171	WR21019	Residential Small Site Controller Upgrad	WW	\$ 200,000	\$ 200,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 400,000	100%	0%	0%	C
172	WR21022	Landscape Design Services	WW	\$ 30,000	\$ 30,000	\$ 30,000	\$ 30,000	\$ 30,000	\$ 30,000	\$ 30,000	\$ 30,000	\$ 30,000	\$ 30,000	\$ 300,000	100%	0%	0%	C
173	WR20028	Upper SAR HCP& Int. Model-Water Benefits	WW	\$ 90,000	\$ 88,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 178,000	100%	0%	0%	C
174	WR21003	Shows That Teach	WW	\$ 16,000	\$ 16,000	\$ 16,000	\$ 16,000	\$ 16,000	\$ 16,000	\$ 16,000	\$ 16,000	\$ 16,000	\$ 16,000	\$ 160,000	100%	0%	0%	C
175	WR21015	Landscape Training Classes	WW	\$ 15,000	\$ 15,000	\$ 15,000	\$ 15,000	\$ 15,000	\$ 15,000	\$ 15,000	\$ 15,000	\$ 15,000	\$ 15,000	\$ 150,000	100%	0%	0%	C
176	WR21018	Member Agency Administered Project	WW	\$ 100,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 100,000	100%	0%	0%	C
177	WR21023	CIMIS Station	WW	\$ 5,000	\$ 5,000	\$ 5,000	\$ 5,000	\$ 5,000	\$ 5,000	\$ 5,000	\$ 5,000	\$ 5,000	\$ 5,000	\$ 50,000	100%	0%	0%	C
178	WR21026	Flume Leak Detection Program	WW	\$ 50,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 50,000	100%	0%	0%	C
179	WR21030	Chino Basin Pilot Ag Program	WW	\$ 50,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 50,000	100%	0%	0%	C
180	WR21020	WUE Business Plan Model Update and Wkshp	WW	\$ 4,500	\$ 4,500	\$ 4,500	\$ 4,500	\$ 4,500	\$ 4,500	\$ 4,500	\$ 4,500	\$ 4,500	\$ 4,500	\$ 45,000	100%	0%	0%	C
181	WR21024	WUE Research and Evaluation	WW	\$ 40,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 40,000	100%	0%	0%	C
182	PL18001	Calif. Data Collab. WUE Data Analytics	WW	\$ 5,000	\$ 5,000	\$ 5,000	\$ 2,500	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 17,500	100%	0%	0%	C
183	WR16025	WW Planning Documents	WW	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	100%	0%	0%	C
184	WR20025	Landscape Irrigation Tune-Ups	WW	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	100%	0%	0%	C
<b>WW Total</b>				\$ 3,198,000	\$ 2,956,000	\$ 1,568,000	\$ 1,565,500	\$ 1,363,000	\$ 1,363,000	\$ 1,363,000	\$ 1,363,000	\$ 1,363,000	\$ 1,188,500	\$ 17,291,000				

**Non-Capital Project List Grand Total**

\$ 20,102,479	\$ 10,531,545	\$ 10,147,636	\$ 11,354,275	\$ 11,024,774	\$ 5,981,178	\$ 6,522,848	\$ 6,034,794	\$ 7,298,239	\$ 8,366,000	\$ 97,363,768
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Attachment: City of Chino Appeal Request Form and Supporting Documentation (Appeal of the Draft RHNA Allocation for the City of Chino)

# Appendix C

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## Proposed IERCA Project List

# Appendix C

## Proposed IERCF Project List

ID #	Project #	Project Name	Fund	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	10 Year Total	PAYGO %	GRANT %	DEBT %	OUTSIDE %
185	RA11001	RCA Capital Replacement	RCA											\$ -	100%	0%	0%	0%
186	RA14003	IERCF Receiving Pit and Drain	RCA											\$ -	100%	0%	0%	0%
187	RA15001	IERCF Baghouse and Dust Collection	RCA											\$ -	100%	0%	0%	0%
188	RA15004	Server Replacement	RCA											\$ -	100%	0%	0%	0%
189	RA16003	IERCF Data Server Replacement	RCA											\$ -	100%	0%	0%	0%
190	RA17001	IERCF Transition Air Duct Improvement	RCA	\$ 100,000										\$ 100,000	100%	0%	0%	0%
191	RA17002	Replace Printers - IERCF	RCA											\$ -	100%	0%	0%	0%
192	RA17007	IERCF Building Improvements	RCA											\$ -	100%	0%	0%	0%
193	RA18002	IERCF Solar Photovoltaic Power	RCA											\$ -	100%	0%	0%	0%
194	RA19001	IERCF Pug Mill Improvements	RCA	\$ 100,000										\$ 100,000	100%	0%	0%	0%
195	RA19002	IERCF Trommel Screen Improvement	RCA		\$ 200,000			\$ 200,000					\$ 200,000	\$ 600,000	100%	0%	0%	0%
196	RA19003	IERCF Front End Loader Replacement	RCA	\$ 400,000		\$ 400,000								\$ 800,000	100%	0%	0%	0%
197	RA19004	IERCF Cybersecurity Project	RCA											\$ -	100%	0%	0%	0%
198	RA19101	IERCF Capital Replacement	RCA											\$ -	100%	0%	0%	0%
199	RA20001	IERCF Amendment Hopper Improvement	RCA											\$ -	100%	0%	0%	0%
200	RA20002	IERCF Biosolids Hopper Improvement	RCA											\$ -	100%	0%	0%	0%
201	RA20003	IERCF Belt Conveyor Improvement	RCA			\$ 250,000			\$ 200,000		\$ 200,000			\$ 650,000	100%	0%	0%	0%
202	RA20004	IERCF Mis. Fan Improvements	RCA				\$ 300,000							\$ 300,000	100%	0%	0%	0%
203	RA20005	RCA Capital Replacement	RCA	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 5,000,000	100%	0%	0%	0%
204	RA20006	RCA Exterior Paint	RCA											\$ -	100%	0%	0%	0%
205	RA20007	RCA Compost Storage Convey	RCA											\$ -	100%	0%	0%	0%
206	RA21001	RCA Fire Sprinkler Improvement	RCA	\$ 300,000	\$ 300,000									\$ 600,000	100%	0%	0%	0%
207	RA23001	IERCF Inner Roof Lining Repair	RCA			\$ 200,000	\$ 200,000							\$ 400,000	100%	0%	0%	0%
208	RA2401	RCA Corrosion Replacement	RCA				\$ 200,000							\$ 200,000	100%	0%	0%	0%
209	RA2501	RCA Compost Storage Facility	RCA					\$ 700,000						\$ 700,000	100%	0%	0%	0%

**RCA Total** \$ 1,400,000 \$ 1,000,000 \$ 1,350,000 \$ 1,200,000 \$ 1,400,000 \$ 700,000 \$ 500,000 \$ 700,000 \$ 500,000 \$ 700,000 \$ 9,450,000

**IERCF Project List Grand Total**

**\$ 1,400,000 \$ 1,000,000 \$ 1,350,000 \$ 1,200,000 \$ 1,400,000 \$ 700,000 \$ 500,000 \$ 700,000 \$ 500,000 \$ 700,000 \$ 9,450,000**

# Appendix D

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## Proposed Grant Dependent Project List

# Appendix D

## Proposed Grant Dependent Project List

ID #	Project #	Project Name	Fund	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	10 Year Total	PAYGO %	GRANT %	DEBT %	OUTSIDE %
210	EN16060	Recycled Water Inter-Connections	WC	\$ 1,500,000	\$ 3,000,000	\$ 18,000,000	\$ 40,000,000	\$ 10,500,000	\$ 3,500,000	\$ 3,500,000	\$ -	\$ -	\$ -	\$ 80,000,000	0%	100%	0%	0%
211	EN16065	RW Connections to JCSD	WC	\$ 4,255,200	\$ 7,210,200	\$ 18,746,520	\$ 2,884,080	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 33,096,000	0%	100%	0%	0%
<b>WC Total</b>				\$ 5,755,200	\$ 10,210,200	\$ 36,746,520	\$ 42,884,080	\$ 10,500,000	\$ 3,500,000	\$ 3,500,000	\$ -	\$ -	\$ -	\$ 113,096,000				
<b>Proposed Grant List Grand Total</b>				\$ 5,755,200	\$ 10,210,200	\$ 36,746,520	\$ 42,884,080	\$ 10,500,000	\$ 3,500,000	\$ 3,500,000	\$ -	\$ -	\$ -	\$ 113,096,000				



## **Inland Empire Utilities Agency**

6075 Kimball Avenue

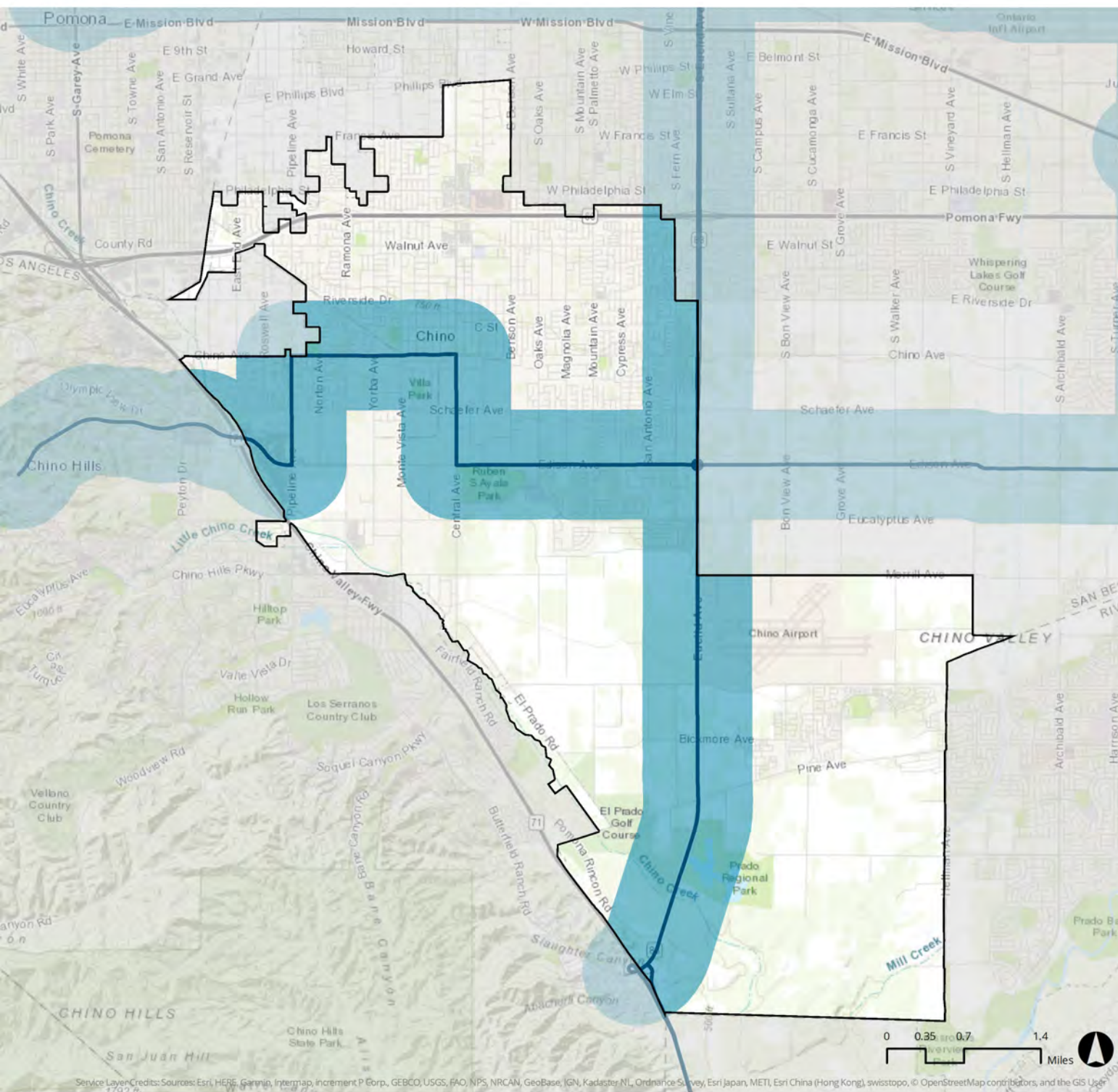
Chino, CA 91708

Phone: (909) 993-1600

**[www.ieua.org](http://www.ieua.org)**







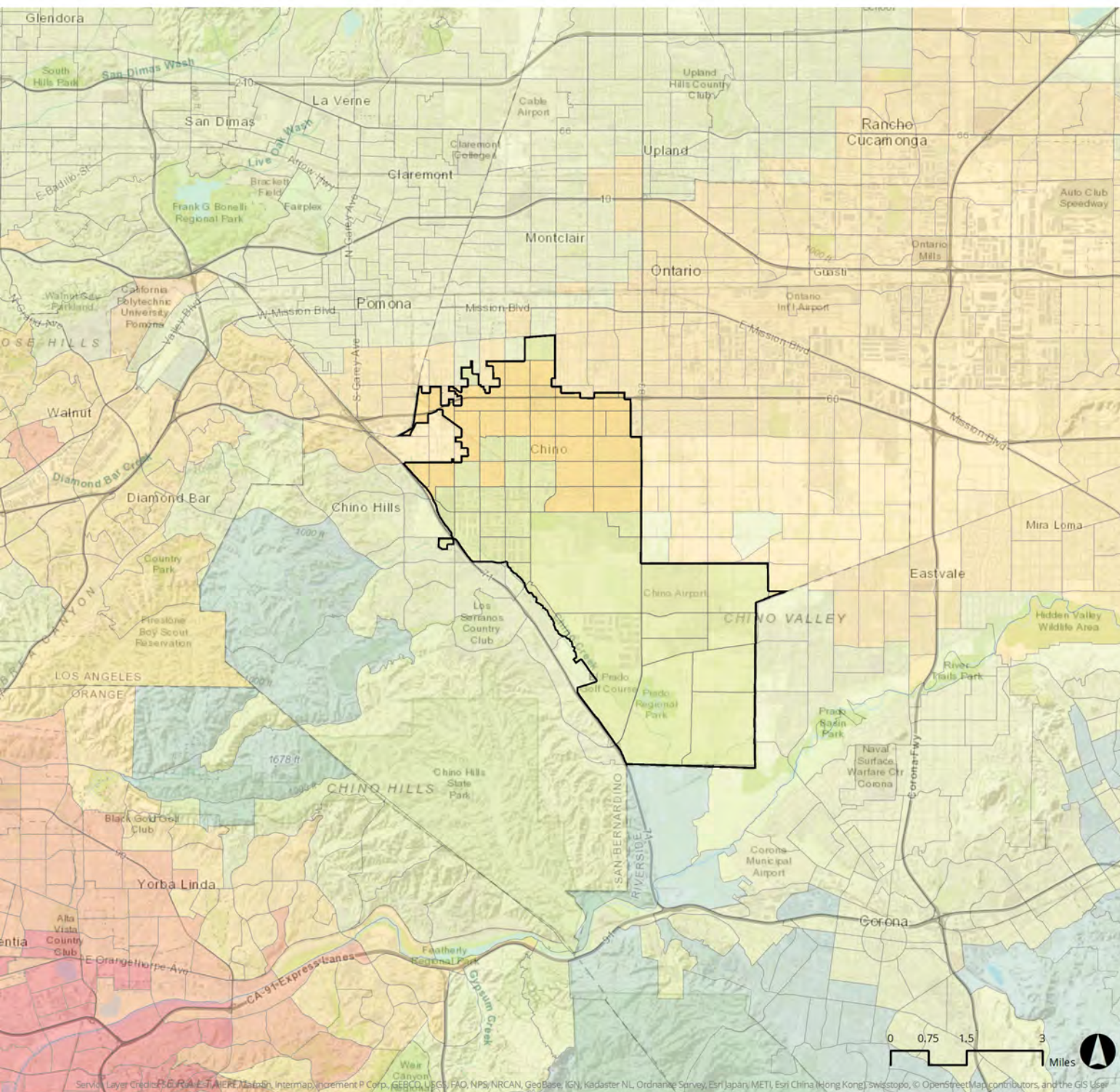
## Major Transit Stops and High Quality Transit Areas in City of Chino [Year 2045]

- Major Transit Stops
- High Quality Transit Corridors (HQTCS)
- High Quality Transit Areas (HQTAs)

Note: SCAG identifies Major Transit Stops and High Quality Transit Corridors (HQTCS), and their surrounding areas in one-half mile radius distance as specified in Section 21155.(b)(3). Major transit stops and HQTCS are extracted from 2045 plan year data of Connect SoCal. SCAG's High Quality Transit Area (HQTA) is within one-half mile from Major Transit Stops and HQTCS and developed based on the language in SB375; however, freeway transit corridors with no bus stops on the freeway alignment do not have a directly associated HQTA. The RHNA process, per Section 65584 et seq., specifies that SCAG's housing needs allocation plan shall further several objectives including those related to infill development and jobs-housing balance. To that end, SCAG's Regional Council-adopted 6th Cycle Final RHNA Methodology relies on a jurisdiction's forecasted 2045 population within HQTAs to allocate housing need.

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

Disclaimer: The information shown on this map reflect jurisdiction's input submitted during the Local Input and Envisioning Process for the City of Chino. SCAG shall not be responsible for user's misuse or misrepresentation of this map. For the details regarding the sources, methodologies and data please refer to the SCAG Data/Map Book at [connectsocial.org/Pages/Local-Input-Process.aspx](https://connectsocial.org/Pages/Local-Input-Process.aspx) or contact [RTPLocalInput@scag.ca.gov](mailto:RTPLocalInput@scag.ca.gov).



## TAZ-level job accessibility in and around: City of Chino [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, methods 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

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

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 (Appeal of the Draft RHNA Allocation for the City of Chino)





Southern California Association of Governments  
Remote Participation Only  
January 6, 2021

**To:** Regional Housing Needs Assessment (RHNA) Appeals Board

**EXECUTIVE DIRECTOR'S  
APPROVAL**

**From:** Kevin Kane, Senior Regional Planner,  
(213) 236-1828, kane@scag.ca.gov

**Subject:** Appeal of the Draft RHNA Allocation for the City of Chino Hills

**RECOMMENDED ACTION:**

Deny the appeal filed by the City of Chino Hills (the City) to reduce the Draft RHNA Allocation for the City by 1,797 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(S):**

The City of Chino Hills requests a reduction of its RHNA allocation by 1,797 units (from 3,720 units to 1,923 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) Existing or projected jobs-housing balance
- 3) Distribution of household growth assumed for purposes of comparable Regional Transportation Plans

The City asserts that the revisions to its allocation are necessary to correct inaccuracies and further the intent of the objectives of Government Code Section 65584(d).<sup>1</sup>

<sup>1</sup> The five RHNA objectives are: 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 reduction targets as established by the California 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)).

**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 Chino Hills' draft RHNA allocation. The City contends that the 6<sup>th</sup> Cycle Draft RHNA allocation relies on flawed TAZ data to establish commute times and miscalculates Chino Hills' existing need due to job accessibility share and the fact that there are no High Quality Transit Areas (HQTAs) in the City.

SCAG adhered to its Connect SoCal Growth Vision process in finalizing forecasted growth at the TAZ level, which did result in adjustments to TAZ-level data for the City of Chino Hills. The City of Chino Hills was notified of two opportunities to provide feedback on TAZ-level growth forecast data on October 31, 2019 and May 26, 2020. SCAG did not receive comments from the City following these notices and thus relied on the adjusted TAZ data.

The City requests a reduction in its draft RHNA allocation due to a miscalculation of the job accessibility share; however Chino Hills' employment data was previously verified by city staff and the commute time-based measures raised by the city are not used in the job accessibility measure, which was adopted by the Regional Council as part of the final 6<sup>th</sup> cycle RHNA methodology.

Chino Hills also requests a reduction based on a claim that the city does not have HQTAs; however, the adopted final RHNA methodology uses population in planned 2045 HQTAs as one determinant of housing need. While there is currently no HQTA in Chino Hills, SCAG has confirmed that the transit projects which result in this HQTA are anticipated to be operational by 2045.

**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 Chino Hills: 3,720 units  
    Very Low Income: 1,384 units  
    Low Income: 819 units  
    Moderate Income: 787 units  
    Above Moderate Income: 730 units

Additional background related to the Draft RHNA Allocation for the City of Chino Hills 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 Chino Hills. 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 cities in 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: The City contends that SCAG failed to correctly apply the adopted Final RHNA Methodology for the 6th Cycle RHNA (2021-2029) [Government Code Section 65584.05 (b)(1)].***

*Chino Hills contends that the Final RHNA Methodology was incorrectly applied to the City because the underlying transportation analysis zone (TAZ) data is flawed. They specify that TAZ 1432 is comprised of Chino Hills State Park, over which the City has no jurisdiction, is erroneously assigned a TAZ population of 7,944 for the year 2016 and 10,525 for the year 2040.*

**SCAG Staff Response:** SCAG was not able to find any record of a TAZ 1432. The TAZ that includes Chino Hills State Park, in addition to a portion of the City's urbanized area, which is likely referenced by the City, is TAZ 53609100. The Bottom-Up Local Input and Envisioning Process requested population data for 2016, 2020, 2030, 2035, and 2045. 2040 was not included and no 2040 figures were used. While this TAZ does consist of state park land, it also includes an existing population of 7,944 individuals and 2,276 households in the base year of 2016. Chino Hills submitted a data input verification form on October 16, 2018 that included local jurisdiction growth in addition to TAZ-level growth following a local input meeting between SCAG staff and City of Chino Hills staff in March 2018. During the Connect SoCal Growth Vision process, SCAG made revisions to TAZ-level growth, adding approximately 600 households to TAZ 53609100. SCAG then provided Chino Hills with two opportunities on October 31, 2019 and May 26, 2020 to provide responses to this adjustment. The local input and Growth Vision processes are described in detail in Attachment 1. SCAG did not receive feedback or technical corrections by the final deadline on June 9, 2020. Therefore, SCAG used the data developed through the Growth Vision process.

**Issue 2: The City contends that SCAG failed to adequately consider information related to existing or projected jobs-housing balance [Government Code Section 65584.04(e)(1)].**

Government Code Section 65584.04(e)(1)] indicates that, to the extent sufficient data is available, the following factor shall be included in developing the RHNA methodology:

*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.*

Chino Hills challenges SCAG’s calculation of job accessibility. SCAG’s “Profile of City of Chino Hills” (May 2019) cites 16,647 commuters in Chino Hills, 65.3% of whom spend more than 30 minutes traveling to work, and 34.7% of whom spend 30 minutes or less traveling to work. The Connect SoCal Plan does not include improvements to the main highways in Chino Hills (SR-71, SR-142, SR-60 and SR-91), therefore commute times are not expected to improve by 2045 and may be expected to increase with the development of additional housing. The City proposes that their regional share of existing need due to job accessibility should be reduced by 65.3% to reflect the fact that 65.3% of commuters in Chino Hills have travel times of over 30 minutes (resulting in a reduction of 910 units, from 1,393 units to 483 units).

**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 travel times of existing commuters 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. Limiting a jobs housing balance assessment solely within a jurisdiction’s boundaries can effectively worsen a regional jobs housing imbalance and thus SCAG staff does not recommend a reduction to the City of Chino Hills draft RHNA allocation based on this factor.

**Issue 3: The City contends that SCAG failed to adequately consider information related to distribution of household growth assumed for purposes of comparable regional Transportation Plans [Government Code Section 65584.04(e)(3)].**

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*Government Code Section 65584.04(e)(3) indicates that, to the extent sufficient data is available, the following factor shall be included in developing the RHNA methodology:*

*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.*

*Chino Hills contends that the City does not have HQTAs that facilitate access to jobs and does not have the existing or planned highway capacity to ensure reasonable commute times (30 minutes or less) to employment centers. Placing additional housing in Chino Hills based on incorrect data does not promote improve intraregional jobs/housing balance nor will it improve the balance between the number of low-wage jobs and the number of affordable housing units in Chino Hills. The City further claims that “SCAG does not provide the data to support this assignment, and in fact there is no data that can support it.”*

**SCAG Staff Response:** The adopted final RHNA methodology includes a component that calculates need based on a jurisdiction’s population within a high-quality transit areas (HQA).

For planning and SCS purposes, SCAG identifies a ‘High Quality Transit Area’ as generally a walkable transit village or corridor that is within one-half mile of a major transit stop or ‘High Quality Transit Corridor’ (HQTC) as defined in Government Code 21155(b) and 21064.3 excluding freeway transit corridors with no bus stops on the freeway alignment. (See also Appendix 1 of the Connect SoCal Technical Report: Transportation System – Transit).<sup>2</sup> SCAG’s technical methodology for identifying HQTCs and major transit stops is based on input from the Regional Transit Technical Advisory Committee (RTTAC), as well as consultation with local agencies, other large MPOs in California, and the Governor’s Office of Planning and Research.

Planned HQTCs and major transit stops are future improvements that are expected to be implemented by transit agencies by the RTP/SCS horizon year of 2045. These are assumed by definition to meet the statutory requirements of an HQTC or major transit stop. SCAG updates its inventory of planned major transit stops and HQTCs with the adoption of a new RTP/SCS, once every four years. However, transit planning studies may be completed by transit agencies on a more frequent basis than the RTP/SCS is updated by SCAG and as such it is understood that planned transit projects are subject to further project-specific evaluation, but that is the nature of the long range planning process. While there is an inherent chance that transit agencies may change future plans, ultimately SCAG’s adopted final RHNA methodology uses this definition of 2045 HQTAs in order to better align future housing with anticipated future transit.

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<sup>2</sup> [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial\\_transit.pdf?1606002122](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_transit.pdf?1606002122)

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The adopted RHNA methodology considers the Connect SoCal Growth Forecast in assigning population to planned (2045) HQTAs. This methodology ensures that the RHNA component of population within HQTAs results in a direct linkage to the regional transportation plan, strengthening the consistency between these two planning processes. Using the calculation from the RHNA methodology, the City of Chino Hills was assigned a need of 888 based on population within planned (2045) HQTAs. A map of planned (2045) HQTAs within the jurisdiction is attached to this staff report. The planned (2045) HQTA in Chino Hills is a transit corridor project consisting of an Express Bus on Grand/Edison from Chino Hills Parkway to Eastvale that SBCTA submitted to SCAG, listed in the Project List as planned RTP project #4120211. This is not a new project, and this corridor was also identified as a planned HQTC in the 2016 RTP. This information was available for public review following the release of the draft Connect SoCal plan in November 2019. Details can be found in the Connect SoCal Public Participation and Consultation Technical Report. SCAG staff does not recommend a reduction to its 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 Chino Hills)
2. Map of High Quality Transit Areas in the City of Chino Hills (2045)
3. Map of Job Accessibility in the City of Chino Hills (2045)
4. City of Chino Hills Appeal and Supporting Documentation
5. Comments received during the comment period

## **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 Chino Hills 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 Chino Hills'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 Chino Hills, the anticipated number of households in 2020 was 24,723 and in 2030 was 27,129 (growth of 2,406 households). In March 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 Chino Hills on the growth forecast was received in October 2018. Following input, household totals were 24,418 in 2020 and 25,868 in 2030, for a reduced household growth during this period of 1,450.

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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:  
[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://scagrtpscscs.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 Chino Hills 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 (GHG) emissions from automobiles and light trucks to achieve Southern California’s GHG reduction targets, 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 may be accessed 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 (SPM-DM) site: <http://spmdm.scag.ca.gov>. 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 Chino Hills 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 the California Department of Housing and Community Development (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 eight-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 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 Chino Hills

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 Chino Hills received its draft RHNA allocation on September 11, 2020. Application of the RHNA methodology

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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).

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

<b>Chino Hills city statistics:</b>		<i>Regional Percentile:</i>
Forecasted household (HH) growth, RHNA period:	1196	65%
Percent of households who are renting:	23%	12%
Housing unit loss from demolition (2009-18):	3	40%
Adj. forecasted household growth, 2020-2045:*	3,763	-
Pct. of regional jobs accessible in 30 mins (2045):**	9.78%	43%
Share of region's job accessibility (pop-weighted):	0.33%	67%
Share of region's HQT population (2045)	0.21%	66%
Share of pop. in low/very low-resource tracts:	0.00%	-
Share of pop. in very high-resource tracts:	99.51%	-
Social equity adjustment:	180%	-

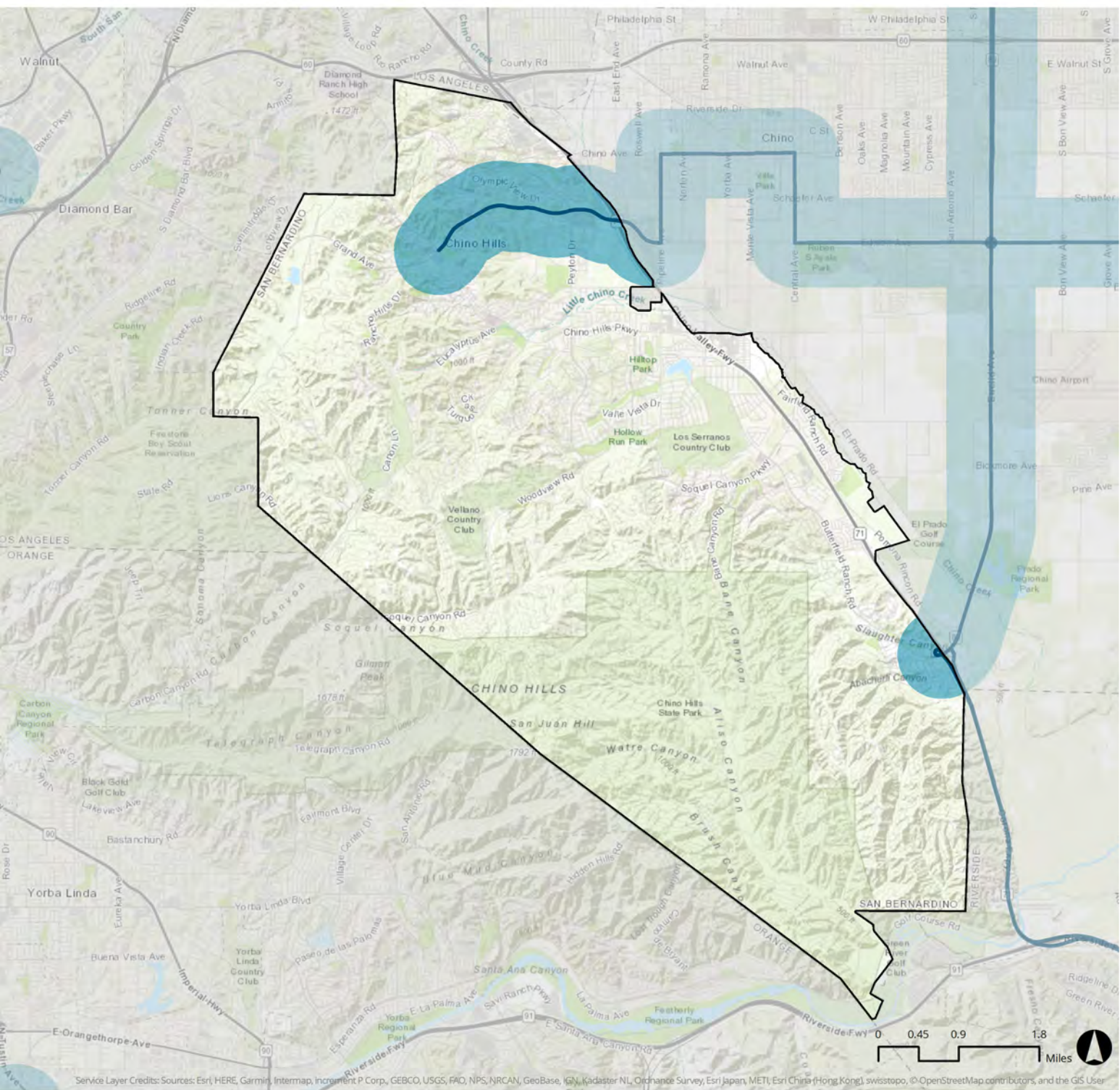
RHNA Allocation inputs for Chino Hills city		
Forecasted household (HH) growth, RHNA period:	1196	
Vacancy Adjustment	28	
Replacement Need	3	
<b>TOTAL PROJECTED NEED:</b>	<b>1227</b>	
Existing need due to job accessibility (50%)	1393	
Existing need due to HQTAs pop. share (50%)	888	
Net residual factor for existing need <sup>^</sup>	212	
<b>TOTAL EXISTING NEED</b>	<b>2493</b>	
<b>TOTAL RHNA FOR CHINO HILLS CITY</b>	<b>3720</b>	<i>Pct of total</i>
Very-low income (<50% of AMI)	1384	37.2%
Low income (50-80% of AMI)	819	22.0%
Moderate income (80-120% of AMI)	787	21.2%
Above moderate income (>120% of AMI)	730	19.6%

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 HQTAs and population forecasts. With a forecasted 2045 population of 21,701 living within HQTAs, the City of Chino Hills will represent 0.21 percent of the SCAG region’s total 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 commute time. 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 travel demand model output for the year 2045 rather than assigning housing units based on the number of jobs within 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 the job accessibility factor. From the City of Chino Hills’ median TAZ, it will be possible to reach 12 percent of the region’s jobs in 2045 within a 30-minute automobile commute (1,174,000 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 212 units assigned to the City of Chino Hills.

Please note that the above represents only a partial description of the key data and calculations which result in the draft RHNA allocation.



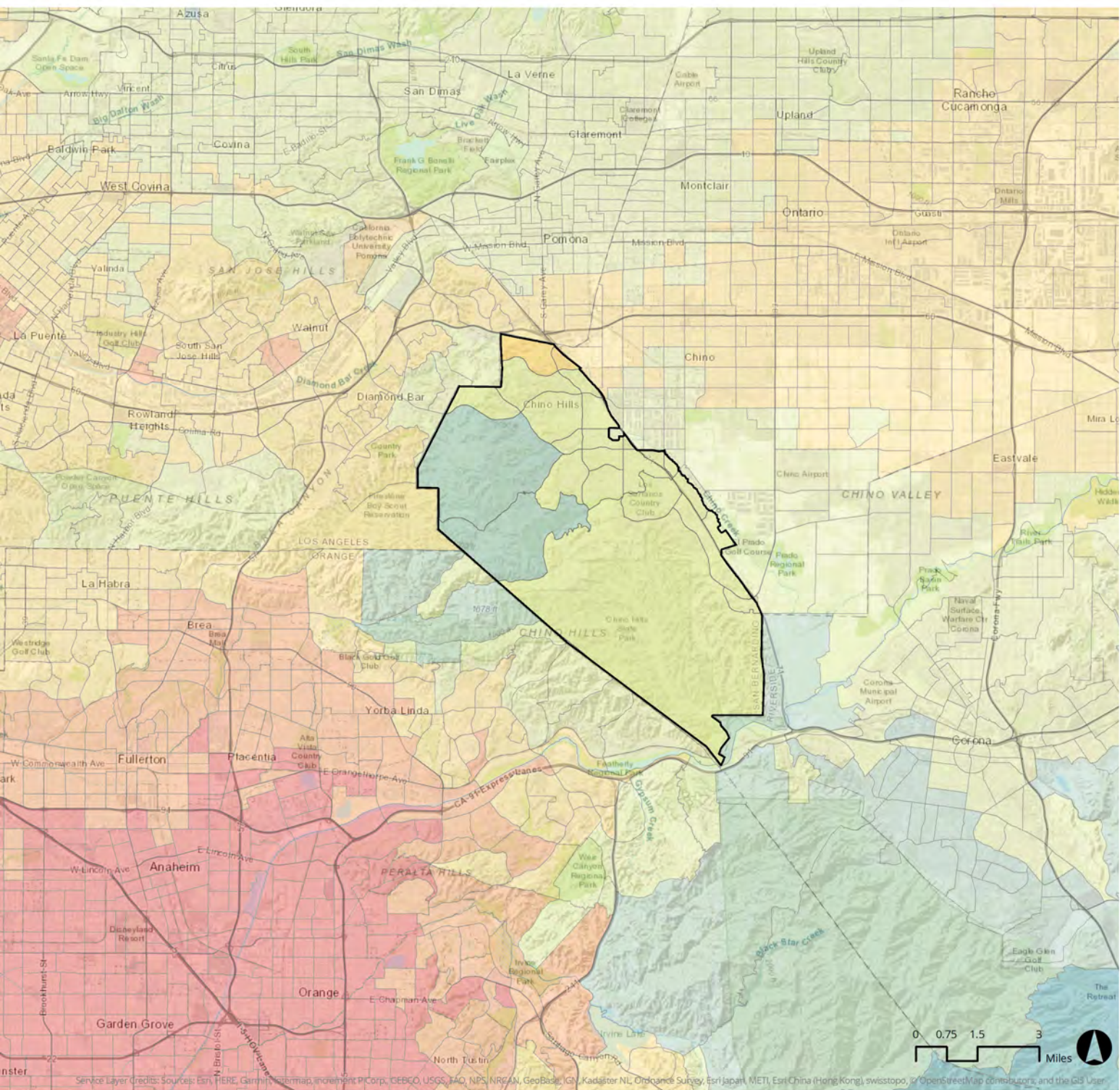
## Major Transit Stops and High Quality Transit Areas in City of Chino Hills [Year 2045]

- Major Transit Stops
- High Quality Transit Corridors (HQTCS)
- High Quality Transit Areas (HQTAs)

Note: SCAG identifies Major Transit Stops and High Quality Transit Corridors (HQTCS), and their surrounding areas in one-half mile radius distance as specified in Section 21155.(b)(3). Major transit stops and HQTCS are extracted from 2045 plan year data of Connect SoCal. SCAG's High Quality Transit Area (HQTA) is within one-half mile from Major Transit Stops and HQTCS and developed based on the language in SB375; however, freeway transit corridors with no bus stops on the freeway alignment do not have a directly associated HQTA. The RHNA process, per Section 65584 et seq., specifies that SCAG's housing needs allocation plan shall further several objectives including those related to infill development and jobs-housing balance. To that end, SCAG's Regional Council-adopted 6th Cycle Final RHNA Methodology relies on a jurisdiction's forecasted 2045 population within HQTAs to allocate housing need.

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

Disclaimer: The information shown on this map reflect jurisdiction's input submitted during the Local Input and Envisioning Process for the City of Chino Hills. SCAG shall not be responsible for user's misuse or misrepresentation of this map. For the details regarding the sources, methodologies and data please refer to the SCAG Data/Map Book at [connectsoocal.org/Pages/Local-Input-Process.aspx](https://connectsoocal.org/Pages/Local-Input-Process.aspx) or contact [RTPLocalInput@scag.ca.gov](mailto:RTPLocalInput@scag.ca.gov).



### TAZ-level job accessibility in and around: City of Chino Hills [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)



October 22, 2020

Kome Ajise, Executive Director  
Southern California Association of Governments (SCAG)  
900 Wilshire Blvd., Suite 1700  
Los Angeles, CA 90017

**Subject: Appeal to 6th Cycle Draft Regional Housing Needs Assessment (RHNA)  
Allocation for City of Chino Hills**

Dear Mr. Ajise:

Thank you for your letter dated September 4, 2020, which transmitted the 6th Cycle Draft RHNA allocation for Chino Hills. Since SCAG kicked off its Bottom-Up Local Input and Envisioning Process in fall 2017, City of Chino Hills staff has diligently participated in the 6th Cycle RHNA process, providing detailed data of existing and future development patterns in Chino Hills. This data included transit availability and transportation analysis zone (TAZ) level population as well as housing and employment data. However, some of this information has not been accurately reflected in SCAG's Draft RHNA allocation for Chino Hills. To ensure the 6th Cycle RHNA allocation is accurate, the City of Chino Hills is filing this appeal pursuant to Government Code Section 65584.05.

The 6th Cycle Draft RHNA allocation miscalculates Chino Hills' "existing need due to High Quality Transit Area (HQTA) and job accessibility population share." This revision to correct these inaccuracies is necessary because accuracy is fundamental to furthering the intent of the Government Code Section 65584, subdivision (d) objectives. This is consistent with, and not to the detriment of, the development pattern in the sustainable communities strategy, or SCAG's Connect SoCal Plan.

The information supporting this appeal is provided in the attached 6th Cycle RHNA Appeal Request Form and attachment. This appeal has also been submitted digitally to [housing@scag.ca.gov](mailto:housing@scag.ca.gov).



Thank you for your consideration in this matter. Please feel free to contact me at (909) 364-2715 or [bmontgomery@chinohills.org](mailto:bmontgomery@chinohills.org), or Joann Lombardo, Community Development Director, at (909)364-2741 or [jlombardo@chinohills.org](mailto:jlombardo@chinohills.org), if you have any questions.

Sincerely,



Benjamin Montgomery  
City Manager, City of Chino Hills

cc: Mayor and City Council, City of Chino Hills  
Joann Lombardo, Community Development Director, City of Chino Hills

Enclosure:

Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form,  
including Attachment #1 and Attachment #2

**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@scaag.ca.gov](mailto:housing@scaag.ca.gov).*  
*Late submissions will not be accepted.*

Date: 10/22/20 Jurisdiction Subject to This Appeal Filing: City of Chino Hills  
*(to file another appeal, please use another form)*

Filing Party (Jurisdiction or HCD)  
City of Chino Hills

Filing Party Contact Name  
Joann Lombardo

Filing Party Email:  
jlombardo@chinohills.org

**APPEAL AUTHORIZED BY:**

Name: Benjamin Montgomery

**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.

To ensure the 6th Cycle RHNA allocation is accurate, the City of Chino Hills is filing this appeal pursuant to Government Code Section 65584.05. The Draft 6th Cycle RHNA methodology miscalculates Chino Hills' existing need for both:

- "Existing need due to High Quality Transit Area (HQTAs); and
- "Job accessibility population share".

Correcting these miscalculations is necessary to ensure the 6th Cycle RHNA meets the Government Code Section 65584 objectives in a manner consistent with, and not to the detriment of, the development pattern in the sustainable communities strategy, or SCAG's Connect SoCal Plan. This revision to correct these inaccuracies is necessary because accuracy is fundamental to furthering the intent of the Government Code Section 65584, subdivision (d) objectives.

Please see Attachment #1, ADDITIONAL PAGES, BRIEF STATEMENT ON WHY THIS REVISION IS NECESSARY.

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

- Correct Existing need due to job accessibility (50%) from 1,393 units to 483 units.
- Correct Existing need due to HQTAs share (50%) from 877 units to 0 units.
- Total reduction of Chino Hills RHNA allocation by 1,797 units.

Please see Attachment #2, ADDITIONAL PAGES, 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 1,797      Added \_\_\_\_\_

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

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

1. Attachment #1. BRIEF STATEMENT ON WHY THIS REVISION IS NECESSARY
2. Attachment #2. BRIEF DESCRIPTION OF APPEAL REQUEST & OUTCOME
- 3.

**FOR STAFF USE ONLY:**

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

## ATTACHMENT #1

### CITY OF CHINO HILLS

#### 6TH CYCLE REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) APPEAL REQUEST FORM - ADDITIONAL PAGES

#### **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):**

The 6<sup>th</sup> Cycle Draft RHNA allocation miscalculates Chino Hills' existing need for both:

- "Existing need due to High Quality Transit Area (HQTA); and
- "Job accessibility population share".

Correcting these miscalculations is necessary to ensure the 6<sup>th</sup> Cycle RHNA meets the Government Code Section 65584(d)(3) objective:

*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.*

As delineated in SCAG's 6<sup>th</sup> RHNA Cycle Appeals Procedures, this appeal is filed in a manner consistent with, and not to the detriment of, the development pattern in the sustainable communities strategy, or SCAG's Connect SoCal Plan. This appeal is made on the following bases, consistent with Government Code Sections 65584.05(b)(1), 65584.05(b)(2) and 65584(d)(3):

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 Government Code Section 65584.04(e) and information submitted by the local jurisdiction relating to affirmatively furthering fair housing pursuant to Government Code Sections 65584.04(b)(2) and 65584(d)(5), including the following:*
  - (a) *Each jurisdiction's existing and projected jobs and housing relationship.*
  - (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.*

The information supporting this appeal is summarized below:

## INACCURATE JOB ACCESSIBILITY REPORTING

In its Final RHNA Allocation Methodology, March 5, 2020, SCAG explains<sup>1</sup>:

*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.*

The RHNA Allocation Methodology was incorrectly applied to Chino Hills both because the underlying TAZ Data as to Chino Hills is incorrect and also because SCAG's calculation fails to consider major transportation routes.

### TAZ Data for Chino Hills Is Flawed

In its Final RHNA Allocation Methodology, SCAG explains that its calculation of commute times is based on data derived at the transportation analysis zone (TAZ) level from travel demand modelling output from SCAG's final Connect SoCal Plan.<sup>2</sup> Using this data, SCAG assigns Chino Hills an "Existing Need Due to Job Accessibility" of 1,393 units. However, SCAG's TAZ data for Chino Hill's is flawed. For example, SCAG TAZ 1432 is comprised of Chino Hills State Park. The City has no jurisdiction over Chino Hills State Park, and the State's plans for the park contain no existing or planned housing. Yet, SCAG erroneously assigns this TAZ a population of 7,944 for year 2016 and 10,525 for year 2040.

### SCAG's Calculation of Job Accessibility Fails to Consider SCAG's Own Verified Data

SCAG's calculation of Chino Hills' jobs accessibility also fails to consider major transportation routes. There are currently only two north south connectors in Chino Hills, State Route (SR-) 71, which is a two-lane highway in each direction, and SR-142, which is a one-lane highway in each direction. Both highways operate at Level of Service "F" during (non-COVID19) peak hours, and average commute times to the major employment hubs north and south of Chino Hills are well over 30 minutes. The SoCal Connect Plan proposes no improvements to SR-71 or SR-142 and no passenger vehicle improvements to other major highways such as the SR-60 or SR-91 that connect to SR-71.<sup>3</sup>

SCAG's "Profile of the City of Chino Hills (May 2019)", which is based on both City and SCAG verified data, reports that there are a total of 16,647 commuters in Chino Hills and that 65.3% of those commuters spend more than 30 minutes to travel to work, or that only the remaining 34.7% of Chino Hills commuters have jobs that can be accessed in a 30 minute drive time.<sup>4</sup> This data accurately reflects the existing conditions in Chino Hills, which as described above, has limited highway access. Because the SCAG SoCal Connect Plan does not include road improvements

<sup>1</sup> SCAG Final RHNA Allocation Methodology. Page 10.

<sup>2</sup> Id.

<sup>3</sup> SCAG SoCal Connect, adopted September 3, 2020, Exhibit 3.2 "Sample Major Highway Projects", and Table 3.2 "Sample Major Highway Projects".

<sup>4</sup> SCAG Profile of the City of Chino Hills, Local Profiles Report 2019 (May 2019)

to the highways that serve Chino Hills, commute times from Chino Hills are not expected to improve by 2045 and may be expected to increase with the development of additional housing in Chino Hills and surrounding jurisdictions.

To more accurately reflect that only 34.7% of commuters in Chino Hills have a 30 minute or less travel time, both now and in the future, Chino Hills' regional share of existing need due to job accessibility should be reduced by 65.3%. This results in a recalculation of Chino Hills' "existing need due to jobs accessibility" from 1,393 units to 483 units.

Recalculating Chino Hills' job accessibility share meets Government Code Section 65584.05(b)(1) and 65584.05(b)(2) appeal requirements and is consistent with RHNA objective specified in Government Code 65584(d)(3).

**INACCURATE HQTA REPORTING**

In its Final RHNA Allocation Methodology, March 5, 2020, SCAG explains<sup>5</sup>:

*"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. [Emphasis added]**"*

SCAG identifies an HQTA as an area within a half-mile of transit stations and corridors with at least a fifteen (15) minute headway during peak hours for bus service. QTAs are based on state statutory definitions of QTAs which includes transit corridors and major transit stops.<sup>6</sup> Based on this definition, SCAG assigns Chino Hills an "existing need due to HQTA population share" of 887 units. However, SCAG does not provide the data to support this assignment, and in fact there is no data that can support it.

Chino Hills does not have any existing transit routes that meet the SCAG HQTA definition. Omnitrans, which provides bus service to Chino Hills, has struggled to maintain any bus service to our City and has switched to on-demand models and away from transit stops. Currently, there is only one fixed bus route and one transit stop in Chino Hills: Route 88 which stops at Grand Avenue and City Center Drive in Chino Hills and connects to the Chino Transit Center at generally one-hour intervals.<sup>7</sup>

The SCAG Connect SoCal Plan, which provides a 2020-2045 roadmap to expand transportation options, provides no transit connections to Chino Hills.<sup>8</sup>

Consistent with SCAG's stated methodology above, Chino Hills does not have an HQTA population and should not receive an existing need based on this factor. Consequently, the Draft RHNA Plan should be corrected to change Chino Hills' "existing need due to HQTA population share" from 887 units to zero units.

<sup>5</sup> SCAG Final RHNA Allocation Methodology, page 10.

<sup>6</sup> Id, page 9.

<sup>7</sup> Route 88 from page 69 of Omnitrans Busbook, September 8, 2020 – January 4, 2021.

<sup>8</sup> SCAG SoCal Connect, adopted September 3, 2020, Exhibit 3.1 "2045 Plan Transit Network".

Correcting Chino Hills' HQTAs share meets Government Code Section 65584.05(b)(1) and 65584.05(b)(2) appeal requirements and is consistent with RHNA objective specified in Government Code 65584(d)(3).

## ATTACHMENT #2

### CITY OF CHINO HILLS

### 6TH CYCLE REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) APPEAL REQUEST FORM - ADDITIONAL PAGES

#### BRIEF DESCRIPTION OF APPEAL REQUEST AND DESIRED OUTCOME:

Consistent with the Government Section 65584(d)(3) objective, the Draft RHNA Plan is required to place houses in jurisdictions with access to jobs. Chino Hills does not have HQTAs areas that facilitate access to jobs and does not have the existing or planned highway capacity to ensure reasonable commute times (30 minutes or less) to employment centers. Placing additional housing in Chino Hills based on incorrect data does not promote improved intraregional relationships between jobs and housing, and would not improve the balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in Chino Hills.

By correcting Chino Hills' Draft RHNA Plan allocation as indicated in this appeal, the Draft RHNA Plan would more fully meet the Government Section 65584(d)(3) objective. Chino Hills therefore requests that our RHNA Allocation inputs be corrected as follows:

RHNA Allocation inputs for Chino Hills city		Corrections	Difference	
Forecasted household (HH) growth, RHNA period:	1196			
Vacancy Adjustment	28			
Replacement Need	3			
<b>TOTAL PROJECTED NEED:</b>	<b>1227</b>			
Existing need due to job accessibility (50%)	1393	483	-910	
Existing need due to HQTAs pop. share (50%)	887	0	-887	
Net residual factor for existing need	213			
<b>TOTAL EXISTING NEED</b>	<b>2493</b>	<b>696</b>	<b>-1797</b>	
<b>TOTAL RHNA FOR CHINO HILLS CITY</b>	<b>3720</b>	<b>1923</b>	<b>-1797</b>	<i>Pct of total</i>
Very-low income (<50% of AMI)	1384	715	-669	37.20%
Low income (50-80% of AMI)	819	423	-396	22.00%
Moderate income (80-120% of AMI)	787	408	-379	21.20%
Above moderate income (>120% of AMI)	731	377	-354	19.60%



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

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

Page 1

A - Contact & Background Information

**This Represents Communication:** \_\_\_\_\_ **From the Jurisdiction of** \_\_\_\_\_ **to SCAG**

**Jurisdiction Contact Person:** \_\_\_\_\_  
**Position:** \_\_\_\_\_  
**Email:** \_\_\_\_\_  
**Phone:** \_\_\_\_\_

**Background Information:**  
 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)  
 I am a staff person from a local jurisdiction, submitting input under supervision of one of the persons identified above (see appropriate signature below)

**Additional Background, if any, based upon Previous Communications:** \_\_\_\_\_  
 \_\_\_\_\_

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:**

**Core Geographic Data:**  
 General Plan Land Use  
 Zoning  
 Existing Land Use  
 Specific Plan Land Use  
 Endangered Species and Plants\*  
 Open Space and Parks\*  
 Flood Areas\*  
 Natural Community and Habitat Conservation Plans\*  
 Farmland\*  
 Coastal Inundation (Sea Level Rise)\*  
 Major Stops and High Quality Transit Corridors\*  
 Transit Priority Areas\*  
 Regional Bikeways  
 Regional Truck Routes  
 City Boundary\*  
 Sphere of Influence\*  
 Census Tracts\*\*  
 Transportation Analysis Zone (TAZ) Boundaries\*\*  
 Entitlements  
 Potential Infill Sites

**Core Demographic Data:**  
 Population  
 Households  
 Employment  
**Year:**  
 2016  
 2020  
 2030 (Input needed at jurisdictional level only)  
 2035  
 2045  
**Geographic Level:**  
 Jurisdictional Level  
 Transportation Analysis Zone (TAZ)  
 Other Geographic Level (Please Specify): \_\_\_\_\_

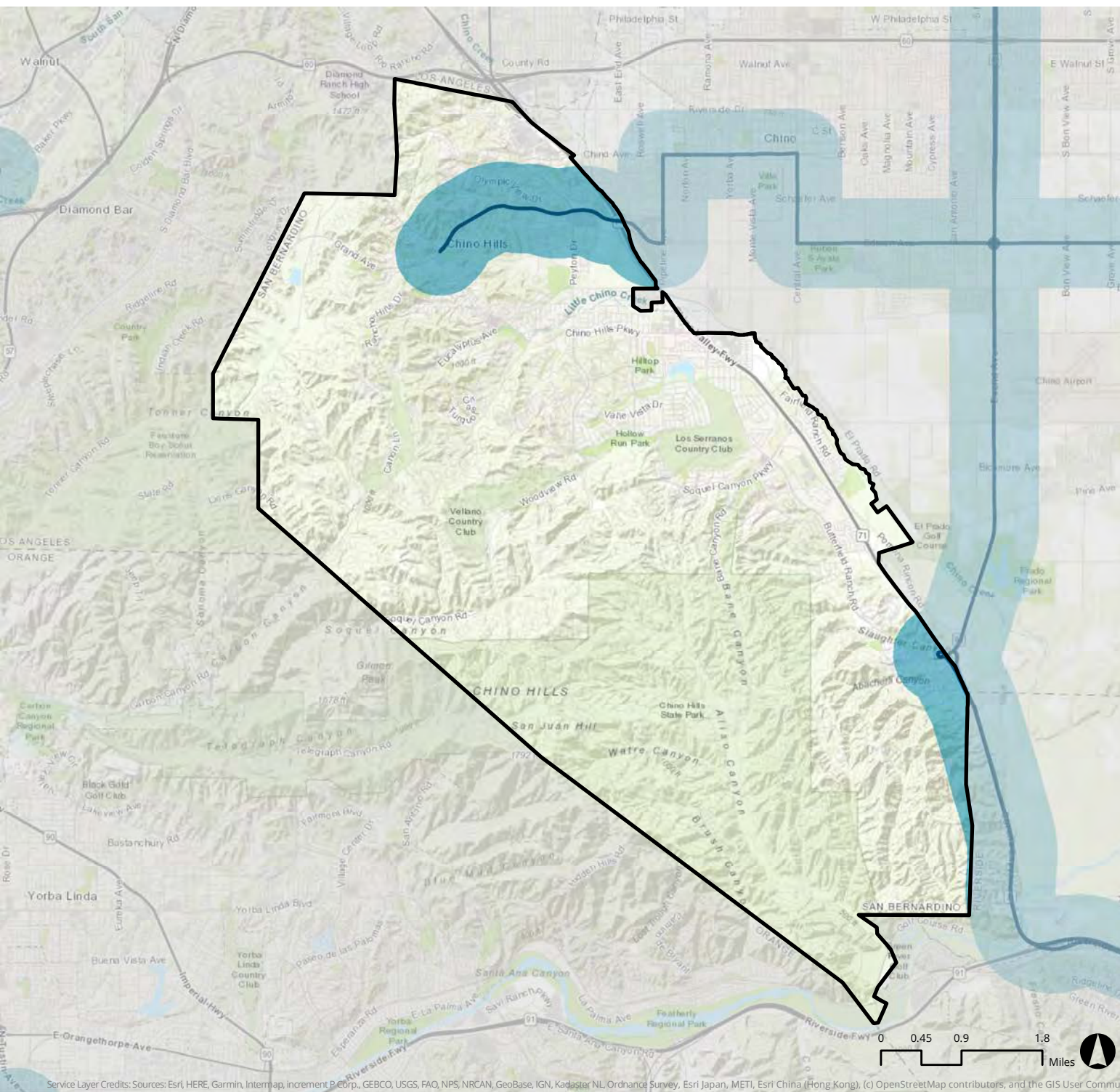
**Supplemental Data Elements (available for review June 2018):**  
 Zoning Overlay Areas  
 Community Design Overlays  
 Community Land Trusts  
 Historic Preservation Areas  
 Bike Sharing Facilities  
 Bike Stations  
 Car-Sharing Parking Sites  
 Joint Public/Private Developments for Affordable Housing  
 Areas with Reduced Parking Minimums and Maximums  
 Corridor Plans  
 Special Districts  
 Bike/Ped Volume Data\*\*\*  
 Ped Trails/Sidewalk Data\*\*\*  
 Public Health Data\*\*\*

\* 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: City of Chino Hills Appeal and Supporting Documentation (Appeal of the Draft RHNA Allocation for the City of Chino Hills)





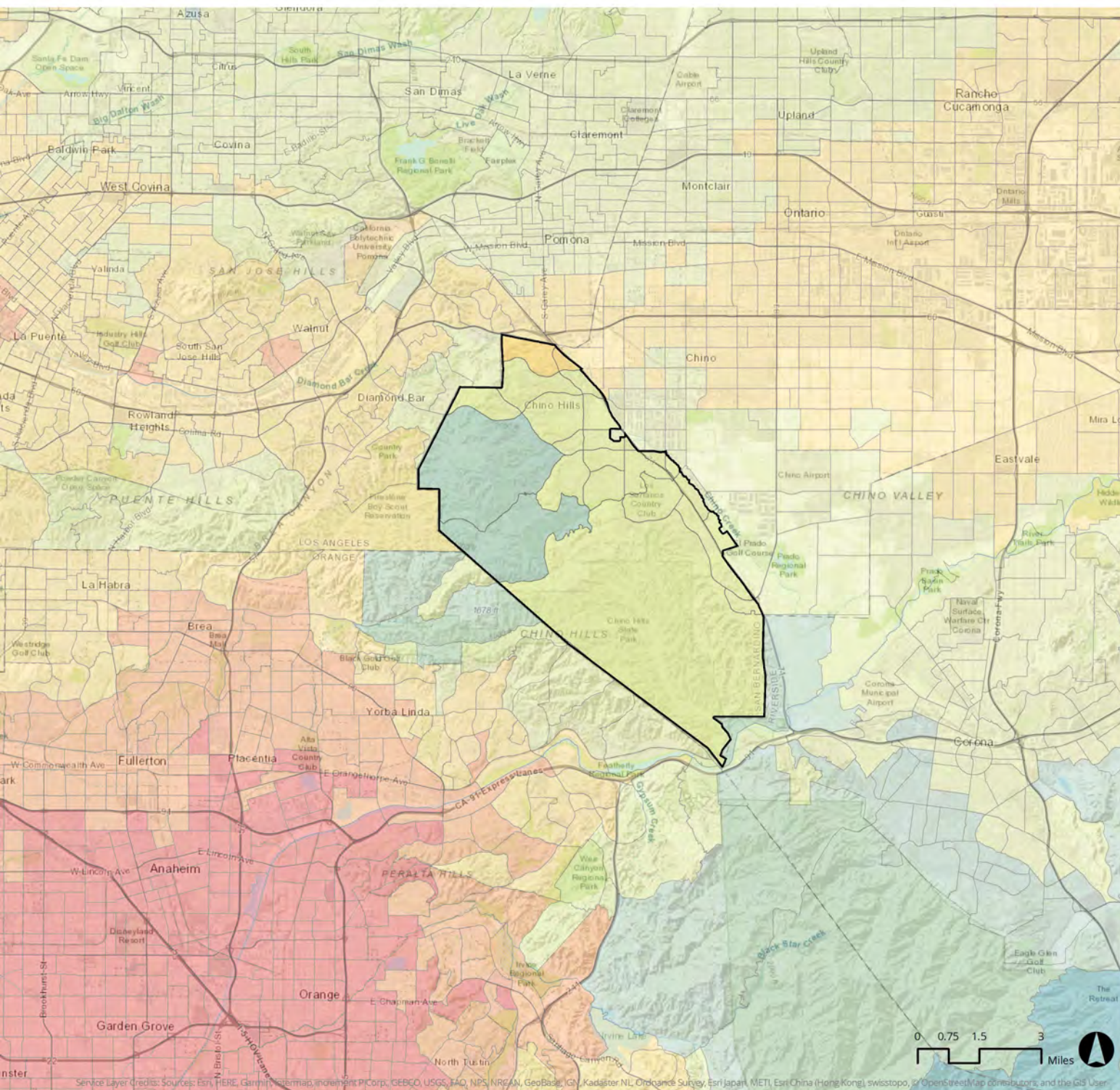
## Major Transit Stops and High Quality Transit Corridors in City of Chino Hills [Year 2045]

- Major Transit Stops
- 📍 High Quality Transit Corridors (HQTCs)
- High Quality Transit Areas (HQTAs)

Note: To assist in identifying transit priority project areas, SCAG identifies Major Transit Stops and High Quality Transit Corridors (HQTCs), and their surrounding areas in one-half mile radius distance, as specified in Section 21155.(b)(3). Major transit stops and HQTCs are extracted from 2045 plan year data of the Draft Connect SoCal. SCAG's High Quality Transit Area (HQTA) is within one-half mile from Major Transit Stops and HQTCs and developed based on the language in SB375. Please note that this map may undergo changes as SCAG continues to update its transportation network as part of the Connect SoCal development process and SCAG shall not be responsible for local jurisdiction's use of this map. Updates to this information will be forthcoming as information becomes available.

Data Source: SCAG, County Transportation Commissions, 2019 | Map Created: 6/18/2019

Disclaimer: The information shown on this map reflect jurisdiction's input submitted during the Local Input and Envisioning Process for the Connect SoCal. SCAG shall not be responsible for user's misuse or misrepresentation of this map. For the details regarding the sources, methodologies and contact information please refer to the SCAG Data/Map Book or contact RTPLocalInput@scag.ca.gov.



## TAZ-level job accessibility in and around: City of Chino Hills [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 [RTPLocalIn](mailto:RTPLocalIn)

**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 (Appeal of the Draft RHNA Allocation for the City of Chino Hills)



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 (Appeal of the Draft RHNA Allocation for the City of Chino Hills)



Southern California Association of Governments  
Remote Participation Only  
January 6, 2021

**To:** Regional Housing Needs Assessment (RHNA) Appeals Board

**EXECUTIVE DIRECTOR'S  
APPROVAL**

**From:** Roland Ok, Program Manager,  
(213) 236-1819, ok@scag.ca.gov

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

**RECOMMENDED ACTION:**

Deny the appeal filed by the City of Fontana (the City) to reduce its draft RHNA allocation by 10,563 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 APPEALS:**

The City of Fontana requests a reduction of its RHNA allocation by 10,563 units (from 17,477 units to 6,914 units) based on the following issues:

- 1) Application of the adopted Final RHNA Methodology for the 6<sup>th</sup> cycle RHNA (2021 – 2029) is inconsistent with the household growth projections determined in the Connect SoCal Plan.\*
- 2) 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.
- 3) Changed circumstances due to the COVID-19 pandemic severely impacting the City’s economy and the development capacity of the private housing market.

\*In the RHNA Appeal Request Form, the City checked the local planning factor “Distribution of household growth assumed for purposes of comparable Regional Transportation Plan.” It appears that the City discusses this factor in the context of the RHNA Methodology.

**RATIONALE FOR STAFF RECOMMENDATION:**

Staff have reviewed the appeal(s) and recommend no change to the City of Fontana 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.

Issue 1: SCAG has allocated total regional housing need (“existing need” and “projected need”) consistent with the Connect SoCal development pattern. Please see staff report Attachment #1, “Local Input and Development of Draft RHNA Allocation”. SCAG has reviewed a wide range of reports to develop the RHNA methodology, and SCAG does not have the authority to further appeal the regional determination. As such, SCAG staff do not recommend granting an appeal on these bases.

Issue 2: The City has not provided evidence that the respective provider has rendered a decision that would prevent the jurisdiction from providing necessary infrastructure. Further, costs to upgrade and develop appropriate infrastructure cannot be considered by SCAG as a justification for a reduction since the RHNA does not require that the assigned unit be developed. As such, SCAG staff do not recommend granting an appeal on this basis.

Issue 3: The long-term impacts of COVID-19 are speculative at this point and are not unique to any single SCAG jurisdiction, and the City has not provided evidence that housing need within Fontana is disproportionately impacted in comparison to the rest of the SCAG region. As such, SCAG staff do not recommend granting an appeal on this basis.

## **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 Allocation for the City of Fontana: 17,477**

Very Low Income: 5,096

Low Income: 2,943

Moderate Income: 3,029

Above Moderate Income 6,409

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 Fontana. 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 Fontana claims that SCAG's adopted RHNA methodology fails to consider growth projections consistent with the Connect SoCal Plan. The City argues that SCAG failed to adequately consider local household growth factors and utilized growth projections inconsistent with Connect SoCal. The City asserts that the RHNA allocation assumes a household growth rate 2.5 times above Connect SoCal forecasts and the City believes that future growth need should be directly tied to projected growth stated within the Connect SoCal.*

*Further, the City cites a Freddie Mac report (February 2020) which indicates that the entire state of California has a shortage of 820,000 housing units, which is lower than the 1.34 million provided by HCD for the SCAG region alone. The City argues that based on the findings provided by the Freddie Mac Report, the total regional allocation should be reduced to 392,075.*

**SCAG Staff Response:** The City asserts that "SCAG's proposed methodology is inconsistent with the household growth projects determined in the Connect SoCal Plan." An appeal citing the adopted (not proposed) RHNA methodology as its basis must appeal the application of the 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. The City has not provided evidence of such a data error or any other misapplication of the adopted RHNA methodology, and thus, the City cannot appeal under this basis. Moreover, appeals shall be based upon comparable data available

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for all affected jurisdictions and accepted planning methodology and supported by adequate documentation.

It is important to note that the regional determination is not a basis for appeal per the adopted RHNA Appeals procedures as it is not within the authority of the Appeals Board to make changes. SCAG staff fully considered the input provided by the City of Fontana during the development of the Integrated Growth Forecast and incorporated this input into the development of projected need for the City's draft RHNA Allocation. SCAG has allocated both "projected need" and "existing need" consistent with the development pattern in the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy ("Connect SoCal"). For further details regarding SCAG's RHNA Methodology please refer to Attachment 1, "Local input and development of draft RHNA allocation". When accounting for total projected and existing need, Fontana's Draft RHNA Allocation is 17,477 units.

Further, 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.

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

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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 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 do not recommend a reduction to Fontana's Draft RHNA Allocation.

***Issue 2: The City contends that SCAG failed to adequately consider information related to sewer and water infrastructure constraints [Government Code Section 65584.04(e)(2)(A)].***

*Government Code Section 65584.04(e)(2)(A) indicates that, to the extent sufficient data is available, the following factor shall be included 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.*

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*The City of Fontana argues that the City does not have adequate water supply capacity to accommodate development of the 2021-2029 RHNA allocation. The City also argues that SCAG's methodology failed to consider a lack of sewer availability. The City states that a lack of available infrastructure creates challenges in subdividing property for infill development or increased density as well as direct constraints to potential new development where water and sewer connections are not adequate, thereby putting additional strain on the City and districts that control water and sewer connections.*

**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 and sewer constraints mentioned by the jurisdiction, it is not evident that the respective providers have rendered decisions that would prevent the jurisdiction from providing necessary infrastructure.

In addition, costs to upgrade and develop appropriate water and sewage infrastructure cannot be considered by SCAG as a justification for a reduction since the RHNA allocation only requires a jurisdiction to plan and zone for its determined housing need and is not required to actually develop the allocated units. In other words, the RHNA allocation is not a building quota. For these reasons, SCAG staff do not recommend a housing need reduction based upon this planning factor.

**Issue 3: The City contends that SCAG failed to consider changed circumstances [Government Code 65584.05(b)].**

*The City of Fontana argues that the COVID-19 pandemic presents an unforeseen changed circumstance that has severely impacted the City's economy, the current and future housing market and impacted the development capacity of the private market to create housing within Fontana. The City also argues that due in part of the COVID-19 pandemic, the state of California is experiencing population growth levels at historically low levels, which also merits a revision to the draft RHNA allocation.*

**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>1</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 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.

**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 Methodology (City of Fontana)
2. City of Fontana Appeal Request Form and Supporting Documentation
3. Map of High Quality Transit Areas in the City of Fontana (2045)
4. Map of Job Accessibility in the City of Fontana (2045)
5. Comments Received During the Comment Period

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<sup>1</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)

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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 Fontana 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 Fontana'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 the 2020 Regional Transportation Plan/Sustainable Communities Strategy (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 Fontana, the anticipated number of households in 2020 was 55,139 and in 2030 was 66,769 (growth of 11,630). On March 26, 2018, SCAG staff met with staff from the City of Fontana to discuss the Bottom-Up Local Input and Envisioning Process and answer questions. Following input, household totals were 55,139 in 2020 and 64,192 in 2030, for a reduced household growth during this period of 9,053.

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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, Affirmatively Furthering Fair Housing (AFFH) survey, and replacement need survey, to SCAG jurisdictions’ Community Development Directors. SCAG reviewed all submitted responses as part of the development of the draft RHNA methodology. The City of Fontana 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 Fontana and incorporated them into the Growth Vision in December 2019.

**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://scaq.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. Final RHNA Methodology and Draft RHNA Allocation

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 of Connect SoCal on September 3, 2020, and the City of Fontana received its draft RHNA allocation on September 11, 2020. Application of the RHNA methodology yields the draft RHNA allocation for the City of Fontana 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).

City of Fontana Statistics and Inputs		Calculation of Draft RHNA Allocation for Fontana	
Forecasted household (HH) growth, RHNA period: <i>(2020-2030 Household Growth * 0.825)</i>	7,469	Forecasted household (HH) growth, RHNA period:	7,469
Percent of households who are renting:	36%	Vacancy Adjustment: <i>(5% for renter households and 1.5% for owner households)</i>	205
Housing unit loss from demolition (2009-18):	-	Replacement Need:	-
Adjusted forecasted household growth, 2020-2045: <i>(Local input growth forecast total adjusted by the difference between the RHNA determination and SCAG's regional 2020-2045 forecast, +4%)</i>	23,494	TOTAL PROJECTED NEED:	7,674
Percent of regional jobs accessible in 30 mins (2045): <i>(From the jurisdiction's median TAZ)</i>	11.50%	Existing need due to job accessibility (50%):	5,058
Jobs accessible from the jurisdiction's median TAZ (2045): <i>(Based on Connect SoCal's 2045 regional forecast of 10.049M jobs)</i>	1,155,000	Existing need due to HQTAs pop. share (50%):	3,911
Share of region's job accessibility (population weighted):	1.21%	Net residual factor for existing need:	835
		<i>(Negative values reflect a cap on lower-resourced community with good job and/or transit access. Positive values represent the amount being redistributed to higher-resourced communities based on their job and/or transit access)</i>	
Jurisdiction's HQTAs population (2045):	95,605	TOTAL EXISTING NEED:	9,804
Share of region's HQTAs population (2045):	0.93%	<b>TOTAL RHNA FOR THE CITY OF FONTANA:</b>	<b>17,477</b>
Share of population in low/very low-resource tracts:	35.08%	Very-low income (<50% of AMI):	5,096
Share of population in very high-resource tracts:	8.85%	Low income (50-80% of AMI):	2,943
Social equity adjustment:	150%	Moderate income (80-120% of AMI):	3,029
		Above moderate income (>120% of AMI)	6,409

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 HQTAs and population forecasts. With a forecasted 2045 population of 95,605 living within HQTAs, the City of Fontana 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 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 within 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 job accessibility. From the City of Fontana median TAZ, it will be possible to reach 11.5% of the region's jobs in 2045 within a 30-minute automobile commute (1,155,000 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 835 units assigned to the City of Fontana.

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: \_\_\_\_\_



October 26, 2020

Southern California Association of Governments  
Attn: Kome Ajise, Executive Director  
900 Wilshire Blvd., Suite 1700  
Los Angeles, CA 90017

**Subject: City of Fontana Appeal of Draft Housing Unit Allocation for the Sixth Cycle Housing Element (2021-2029)**

**City Council**

**Acquanetta Warren**  
Mayor

**Jesse Armendarez**  
Mayor Pro Tem

**John B. Roberts**  
Council Member

**Jesus "Jesse" Sandoval**  
Council Member

**Phillip W. Cothran**  
Council Member

Dr. Mr. Ajise:

On behalf of our residents, in accordance with applicable Government Code provisions, The City of Fontana (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.

**A. 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 Fontana from 5,977 units for the 5th cycle Housing Element to a proposed 17,477 units. The proposed dwelling unit allocation increase is based on flawed methodologies that conflict with the household growth determinations found within the SoCal Connect Plan and do not fully consider local planning factors unique to the City of Fontana.

Pursuant to Government Code section 65584.05, Fontana 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.

**B. BASIS FOR THE CITY OF FONTANA 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 Fontana'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). These objectives are:*

Attachment: City of Fontana Appeal Request Form and Supporting Documentation (Appeal of the Draft RHNA Allocation for the City of

- a. *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.*
  - b. *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.*
  - c. *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.*
  - d. *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.*
  - e. *Affirmatively furthering fair housing.*
2. **LOCAL PLANNING FACTORS AND INFORMATION AFFIRMATIVELY FURTHERING FAIR HOUSING** - *SCAG failed to consider information submitted by Fontana 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)*
3. **CHANGED CIRCUMSTANCES** - *That a significant and unforeseen change in circumstance has occurred in the Fontana after April 30, 2019 and merits a revision of the information previously submitted by the Fontana. 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).
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The City of Fontana has several major constraints on existing lands that severely limit or restrict the City’s ability to accommodate growth to the extent identified in the RHNA Allocations. SCAG provided the City with Regional Housing Needs Assessment (RHNA) Local Planning Factor Survey dated, April 29, 2019. This Survey is required by law for SCAG to allow jurisdictions to identify local planning factors (formerly known as “AB 2158 factors”) prior to the development of a proposed RHNA methodology, per Government Code 65584.04 (b). Information collected from the survey is required to be included as part of the proposed RHNA methodology.

**(a) METHODOLOGY - 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 SoCal Connect Plan.

According to SCAG’s Connect SoCal Plan, Appendix 1- Demographics and Growth Forecast<sup>1</sup>, The City of Fontana’s household growth is forecasted to reach 77,800 in 2045 from 51,500 in 2016, a total growth of 26,300 over the 30-year period. Comparatively, the American Community Survey 2018 5-year estimates the City of Fontana currently estimates 55,561 households.

<sup>1</sup> Connect SoCal (2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy) Appendix 1, Table 14.

**Table 1** shows a comparison between the annual household development projections in the SoCal Connect Plan and the City’s RHNA allocation. When the SoCal Connect forecasted growth is amortized over the 2021-2029 planning period, it results in an annual household growth of 876 households. The RHNA forecast growth amortized over the same 8-year planning period results in a 2,185 housing unit per year growth, this results in an additional 1,308 housing units per year when amortized over the 8-year planning period. If the RHNA projections were accurate and the development was achieved, the City of Fontana would hit its 25-year projection growth needs in just 12 years; generating a level of growth unprecedented in the City, as well as creating negative impacts on the City’s housing market and infrastructure.

**TABLE 1: Comparison of Household Growth Rates (SoCal Connect vs. RHNA)**

SoCal Connect Forecast Growth (2016-2045)	SoCal Connect Forecast Horizon Year	Average per year household creation	RHNA Estimate Total Growth Need	RHNA Forecast Horizon Year	Average per year household creation
26,300	2045	876	17,477	2029	2,185

The City of Fontana 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 SoCal Connect Plan is inconsistent and directly undermines the validity of Draft RHNA Allocation methodology assumptions.

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 2.5 times above SoCal Connect forecasts. The City of Fontana 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 SoCal Connect Plan.

More recently, a Freddie Mac report (February 2020) indicates that “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 be assumed to have a comparative draft RHNA of 5,106 units rather than the 17,477 units for the 6th Housing Element Cycle.

<b>2</b>	<b>Local Planning Factors</b>	SCAG failed to adequately consider the information submitted pursuant to Section 65584.04(b).
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**(a) LOCAL PLANNING FACTORS – 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.**

The City of Fontana does not have adequate water supply capacity to accommodate development of their 2021-2029 RHNA. The City of Fontana relies on other agencies that have direct control over its water supply, including, The Fontana Water Company (FWC), Cucamonga Valley Water District (CVWD), and the West Valley Water District (WVWD). Service is Primarily provided by the Fontana Water Company

The City of Fontana’s primary water provider, FWC, receives water supply from the following sources:

- Local Groundwater Basins (Chino Basin, Rialto-Colton Basin, Lytle Basin and No Man’s Land Basin);
- Local Surface Water (Lytle Creek); and
- Imported surface water (State Water Project water from Inland Empire Utilities Agency (IEUA) and San Bernardino Valley Municipal Water District (SBVMWD))

In 2015, the FWC completed its Urban Water Management Plan (UWMP) with an amendment in 2017. The purpose of the UWMP is to provide a planning tool for FWC for developing and delivering municipal water supplies to FWC’s water service area based on estimated growth, development and demand through 2040. The following information is from the FWC’s current UWMP.

The Urban Water Management Planning Act requires every “urban water supplier” to prepare and adopt an UWMP, to periodically review its UWMP at least once every five years and make any amendments or changes which are indicated by the review.

Population projections for FWC’s service area have been developed based on a methodology using 2010 U.S. Census data compiled by the Southern California Association of Governments (SCAG) using Traffic Analysis Zones (TAZs). Based on this methodology, the population for the service area is estimated to be 223,307 for 2015 and is estimated to grow to 271,690 by 2040. The UWMP also assumes 4.96 persons per connection or persons per households. As shown in the table below, the FWC service area, made primarily of the City of Fontana, is anticipated to add 23,408 residents between the years 2020 and 2030. Over ten years a project growth of 23,408 residents equates to about 2,340 persons per year, and at the UWMP’s assumed rate of 4.96 persons per household, 472 dwelling units per year.

**TABLE 2: UWMP – Retail: Population – Current and Projected**

Population Served	2015	2020	2025	2030	2035	2040(opt)
	223,307	223,988	233,511	247,396	259,765	271,690
NOTES: 2015 population from DWR Population Tool. Projected data from SCAG Analysis (2015).						

Based on actual water demands for potable water for the year 2015, 17,754-acre feet (AF) were provided to single family residential units and 3,348 AF were provided to multi-family units. Overall, a total of 21,192 AF of potable water was provided to an estimated 223,307 persons or 45,022 households. The 21,192 AF delivered to residents of Fontana in 2015 equates to about 0.47 AF per residential connection, with majority of accounts attributed to single family units, or one dwelling unit. Overall water demand, including industrial, institutional and commercial, equated 39,964 AF.

**TABLE 3: UWMP - Retail: Demands for Potable and Raw Water - Actual**

Use Type	2015 Actual		
	Additional Description (as needed)	Level of Treatment When Delivered	Volume
Single Family		Drinking Water	17,754
Multi-Family	multi-family residential, duplex individually metered, public authority multi-family	Drinking Water	3,438
Institutional/Governmental	public authority	Drinking Water	2,918
Other	commercial/industrial	Drinking Water	6,455
Other	construction	Drinking Water	613
Other	unbilled unmetered (estimated as 1.25% of total supply--see Water Audit)	Drinking Water	437
Other	fire hydrants	Drinking Water	15
Sales/Transfers/Exchanges to other agencies	CVWD Intake- Summit	Drinking Water	8
Sales/Transfers/Exchanges to other agencies	CVWD Intake- Cherry	Drinking Water	16
Sales/Transfers/Exchanges to other agencies	delivered to FUWC irrigation customers	Drinking Water	35
Losses		Drinking Water	2,695
Other	delivered to Cemex	Raw Water	580
<b>TOTAL</b>			<b>34,964</b>
NOTES: Volumes are in AF.			

**Table 4** below shows the projected demand and supply during normal years. To reflect the lasting impacts of the recent drought conditions on future water demands, the projected water use for 2020 was calculated based on the average overall gallons per capita day (GPCD) from 2014 to 2015 (156 GPCD). According to the data in the table below, single family and multifamily residential combined are projected to use 23,806 AF in the year 2020, increasing to 29,753 AF in the year 2030, increasing the estimated AF per connection to .57. Overall, potable and raw water demand for 2030 is 48,773 AF.

**TABLE 4: UWMP – Demands for Potable and Raw Water - Projected**

Use Type	Additional Description (as needed)	Projected Water Use Report To the Extent that Records are Available				
		2020	2025	2030	2035	2040-opt
Single Family		19,944	23,511	24,926	26,188	27,404
Multi-Family	multi-family residential, duplex individually metered, public authority multi-family	3,862	4,553	4,827	5,071	5,306
Institutional/Governmental		3,278	3,864	4,097	4,304	4,504
Other	commercial/industrial	7,251	8,548	9,063	9,522	9,964
Other	construction	689	812	861	904	946
Other	unbilled unmetered (estimated as 1.25% of total supply--see Water Audit)	491	579	614	645	675
Other	fire hydrants	17	20	21	22	23
Losses		3,028	3,569	3,784	3,975	4,160
Other	raw water	580	580	580	580	580
<b>TOTAL</b>		<b>39,140</b>	<b>46,036</b>	<b>48,773</b>	<b>51,211</b>	<b>53,562</b>

NOTES: Volumes are in AF.

**Table 5** shows total water demand for the FWC service areas including both potable and raw water as well as recycled water demand. Total water demand, including residential, commercial, institutional, and industrial, for the year 2030 is 50,773 AF.

**TABLE 5: UWMP – Retail: Total Water Demands**

	2015	2020	2025	2030	2035	2040 (opt)
Potable and Raw Water From Tables 4-1 and 4-2	34,964	39,140	46,036	48,773	51,211	53,562
Recycled Water Demand* From Table 6-4	0	1,000	1,500	2,000	2,500	3,000
<b>TOTAL WATER DEMAND</b>	<b>34,964</b>	<b>40,140</b>	<b>47,536</b>	<b>50,773</b>	<b>53,711</b>	<b>56,562</b>

NOTES: Volumes are in AF; table references refer to DWR table numbers.

The water supply for 2030, considering population and development growth, is a projected 50,773. Based on **Table 5** above and **Table 6** below, in a normal year the FWC estimates that water supply can provide the exact amount of water required to suffice projected demand over the next ten years, assuming an increase of 2,340 persons per year, or 472 households.

**TABLE 6: UWMP – Retail: Water Supplies – Projected**

Water Supply	Additional Detail on Water Supply	Projected Water Supply Report to the Extent Practicable									
		2020		2025		2030		2035		2040 (opt)	
		Reasonably Available Volume	Total Right or Safe Yield (optional)	Reasonably Available Volume	Total Right or Safe Yield (optional)	Reasonably Available Volume	Total Right or Safe Yield (optional)	Reasonably Available Volume	Total Right or Safe Yield (optional)	Reasonably Available Volume	Total Right or Safe Yield (optional)
Purchased or Imported Water	IEUA	10,000		12,000		12,000		12,000		12,000	
Purchased or Imported Water	SBVMWD	2,000		2,000		2,000		2,000		2,000	
Groundwater	Chino Basin	9,920		10,416		13,153		15,591		17,942	
Groundwater	Rialto-Colton Basin	2,520		2,520		2,520		2,520		2,520	
Groundwater	Lytile Basin	5,000		9,400		9,400		9,400		9,400	
Groundwater	No Man's Land Basin	4,000		4,000		4,000		4,000		4,000	
Surface water	Lytile Creek	5,700		5,700		5,700		5,700		5,700	
Recycled Water		1,000		1,500		2,000		2,500		3,000	
	<b>Total</b>	<b>40,140</b>	<b>0</b>	<b>47,536</b>	<b>0</b>	<b>50,773</b>	<b>0</b>	<b>53,711</b>	<b>0</b>	<b>56,552</b>	<b>0</b>

Additionally, there is evidence that a warming trend that occurred during the latter part of the twentieth century will likely continue through the twenty-first century. These changes will have a direct effect on water resources in California, and numerous studies have been conducted to determine the potential impacts to water resources. Based on these studies, climate change could result in the following types of water resource impacts to California:

- Reductions in the average annual snowpack due to a rise in the snowline and a shallower snowpack in the low and medium elevation zones, such as in the Tuolumne River basin, and a shift in snowmelt runoff to earlier in the year;
- Changes in the timing, intensity and variability of precipitation, and an increased amount of precipitation falling as rain instead of as snow;
- Long-term changes in watershed vegetation and increased incidence of wildfires that could affect water quality;
- Sea level rise and an increase in saltwater intrusion;
- Increased water temperatures with accompanying potential adverse effects on some fisheries and water quality;
- Increases in evaporation and concomitant increased irrigation need; and
- Changes in urban and agricultural water demand.

Table 7 shows projected in supply in a single dry year to multiple dry years, up to three. In just one dry year, the FWC cannot provide sufficient water to meet the demands of the service area. For example, for the year 2030, where total projected demand is 50,773, with a single dry year the FWC can supply a total of 37,945 AF.

**TABLE 7: UWMP – Project Water Supplies in Single Dry Years and Multiple Dry Years**

Year	Groundwater Supplies						Percentage Groundwater of Total Supply	Surface Water Supplies		Imported Water Supplies		Recycled Water Supplies	Total <sup>1</sup>
	Chino Basin <sup>4</sup>	Rialto-Colton Basin	No Man's Land Basin	Lytile Basin	Sub Total Groundwater	Lytile Creek		IEUA	SBVMWD	Recycled			
<b>Projected Single Dry Year</b>													
2020	7,268	2,520	4,000	5,000	18,788	82.6%	1,710	7,500	1,000	1,000			29,998
2025	6,385	2,520	4,000	9,400	22,315	62.8%	1,710	9,000	1,000	1,500			35,525
2030	8,315	2,520	4,000	9,400	24,235	63.9%	1,710	9,000	1,000	2,000			37,945
2035	10,911	2,520	4,000	9,400	25,931	64.8%	1,710	9,000	1,000	2,500			40,141
2040	11,641	2,520	4,000	9,400	27,561	65.2%	1,710	9,000	1,000	3,000			42,271
<b>Projected Multiple Dry Year 1</b>													
2020	16,027	2,520	4,000	4,000	26,547	70.3%	1,710	7,500	1,000	1,000			37,757
2025	17,464	2,520	4,000	7,520	31,504	70.5%	1,710	9,000	1,000	1,500			44,714
2030	20,099	2,520	4,000	7,520	34,049	71.3%	1,710	9,000	1,000	2,000			47,759
2035	22,273	2,520	4,000	7,520	36,313	71.9%	1,710	9,000	1,000	2,500			50,523
2040	24,454	2,520	4,000	7,520	38,494	72.4%	1,710	9,000	1,000	3,000			53,204
<b>Projected Multiple Dry Year 2</b>													
2020	14,732	2,520	4,000	4,000	25,252	69.3%	1,710	7,500	1,000	1,000			36,462
2025	15,930	2,520	4,000	7,520	29,970	69.4%	1,710	9,000	1,000	1,500			43,180
2030	18,370	2,520	4,000	7,520	32,410	70.3%	1,710	9,000	1,000	2,000			46,120
2035	20,540	2,520	4,000	7,520	34,580	70.9%	1,710	9,000	1,000	2,500			48,790
2040	22,629	2,520	4,000	7,520	36,669	71.4%	1,710	9,000	1,000	3,000			51,379
<b>Projected Multiple Dry Year 3</b>													
2020	8,268	2,520	4,000	4,000	18,788	62.6%	1,710	7,500	1,000	1,000			29,998
2025	8,275	2,520	4,000	7,520	22,315	62.8%	1,710	9,000	1,000	1,500			35,525
2030	10,195	2,520	4,000	7,520	24,235	63.9%	1,710	9,000	1,000	2,000			37,945
2035	11,891	2,520	4,000	7,520	25,931	64.5%	1,710	9,000	1,000	2,500			40,141
2040	13,921	2,520	4,000	7,520	27,961	65.2%	1,710	9,000	1,000	3,000			42,271

<sup>4</sup> Calculated as difference between total and constrained supply sources  
<sup>1</sup> Set equal to projected demand

Based on the information provided and the assumptions made in the FWC's UWMP regarding water supply, the City's RHNA Allocation represents a dwelling unit growth that would exceed the City's available water supply by each year by 3,302 AF in the year 2030. **Table 8** 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. 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 of Fontana contends that a realistic estimate of future growth need should be directly tied to the realistic water capacity available within to the City of Fontana as described in the City's Urban Water Management Plan.

**TABLE 8: Comparison of Water Demand (UWMP vs. RHNA)**

Growth Assumption	Anticipated Dwelling Unit Growth per year (DU)	Projected 2020-2030 Increase in Water Demand for Residential (AF)	2030 Total Anticipated Demand Including All Uses (AF)	2030 Capacity
Fontana Water Company UWMP	472	10,633	50,773	50,773
City's 2021-2029 RHNA Allocation	2185	12,892	53,032	50,773

**(b) LOCAL PLANNING FACTOR - SCAG's methodology failed to consider a lack of sewer availability, as stated in the City's Local Planning Factor Responses.**

Inland Empire Utilities Agency (IEUA) is a regional wastewater treatment agency and wholesale distributor of imported water and operates four Regional Water Recycling Plants (RPs). IEUA is the wastewater authority and recycled water producer in FWC's service area. IEUA's RP-4 treats local wastewater generated by the City of Fontana. IEUA's four RPs have a total combined design treatment capacity of approximately 86 MGD. Currently, all four reclamation facilities treat a total combine average daily flow of about 60 MGD. Local sewer systems are owned and operated by local agencies.

IEUA's RP-4 is responsible for treating local wastewater generated by the City of Fontana and is located near the intersection of Etiwanda Avenue and 6th Street in the City of Rancho Cucamonga. RP-4 treats an average flow of 5 MGD of wastewater and is operated in conjunction with RP-1 to provide recycled water to users. RP-4 was recently expanded to a capacity of 14 MGD.

**TABLE 9: UWMP - Retail: Wastewater Collected Within Service Area, 2015**

Name of Wastewater Collection Agency	Wastewater Volume Metered or Estimated?	Volume of Wastewater Collected from UWMP Service Area 2015	Name of Wastewater Treatment Agency Receiving Collected Wastewater	Treatment Plant Name	Is WWTP Located Within UWMP Area?	Is WWTP Operation Contracted to a Third Party? (optional)
City of Fontana	Metered	11,425	Inland Empire Utilities Agency	IEUA RP-4	No	
City of Fontana	Metered	330	City of Rialto	City of Rialto WWTP	No	
<b>Total Wastewater Collected from Service Area in 2015:</b>		<b>11,755</b>				

NOTES: Volumes are in AF.

However, much of the City's population is not served but this sewer system but rather by septic tanks. In 2017, nearly 12,000 parcels, representing about 40,000 people, that are not connected to sewer service. The City of Fontana accounted for more than half of the septic service connections in the 242-square-miles service area if IEUA.<sup>2</sup> Such a large reliance on septic services raises environmental concerns such as groundwater contamination, inability to recapture water for secondary uses, and health concerns for surrounding communities.<sup>3</sup>

<sup>2</sup> <https://www.sbsun.com/2017/06/12/why-fontana-is-working-to-expand-sewer-system-to-boot-out-septic-tanks/>

<sup>3</sup> <https://longislandsoundstudy.net/wp-content/uploads/2010/03/fact13.pdf>



The City of Fontana has a lack of infrastructure for water lines which is controlled by five (5) other water companies that include Fontana Water, West Valley Water, Cucamonga Valley Water, Marygold Mutual and Crawford Canyon Mutual Water Districts. Additionally, the City's 2011/2012 through 2017/2018 Capital Improvement Plan (CIP) identified two sewer improvement and replacement projects, however did not identify available funding. The 2014/2015 to 2021/2022 updated CIP expected a significant portion of unfunded projects to be funded by the Redevelopment Agency. The CIP identified \$202,270 required funds to complete sewer improvements and updates, however the City only have \$61,789 available funds for such projects.

The projected growth provided by the City's RHNA would outpace the City's ability to provide adequate infrastructure to new development. The City's existing septic system is a legacy of annexation of home into the City. The annexed areas are not connected to the City's sewer system creating unavoidable challenges for new development in appropriate areas which might be suitable for development. Additionally, a lack of available infrastructure creates challenges in subdividing property for infill development or increased density as well as direct constraints to potential new development where septic systems are not adequate and sewer connections would be required per the State Water Quality Control Board. The City of Fontana contends that a realistic estimate of future growth need should be directly tied to the amount of land within the City of Fontana suitable for urban development that is connected to adequate infrastructure.

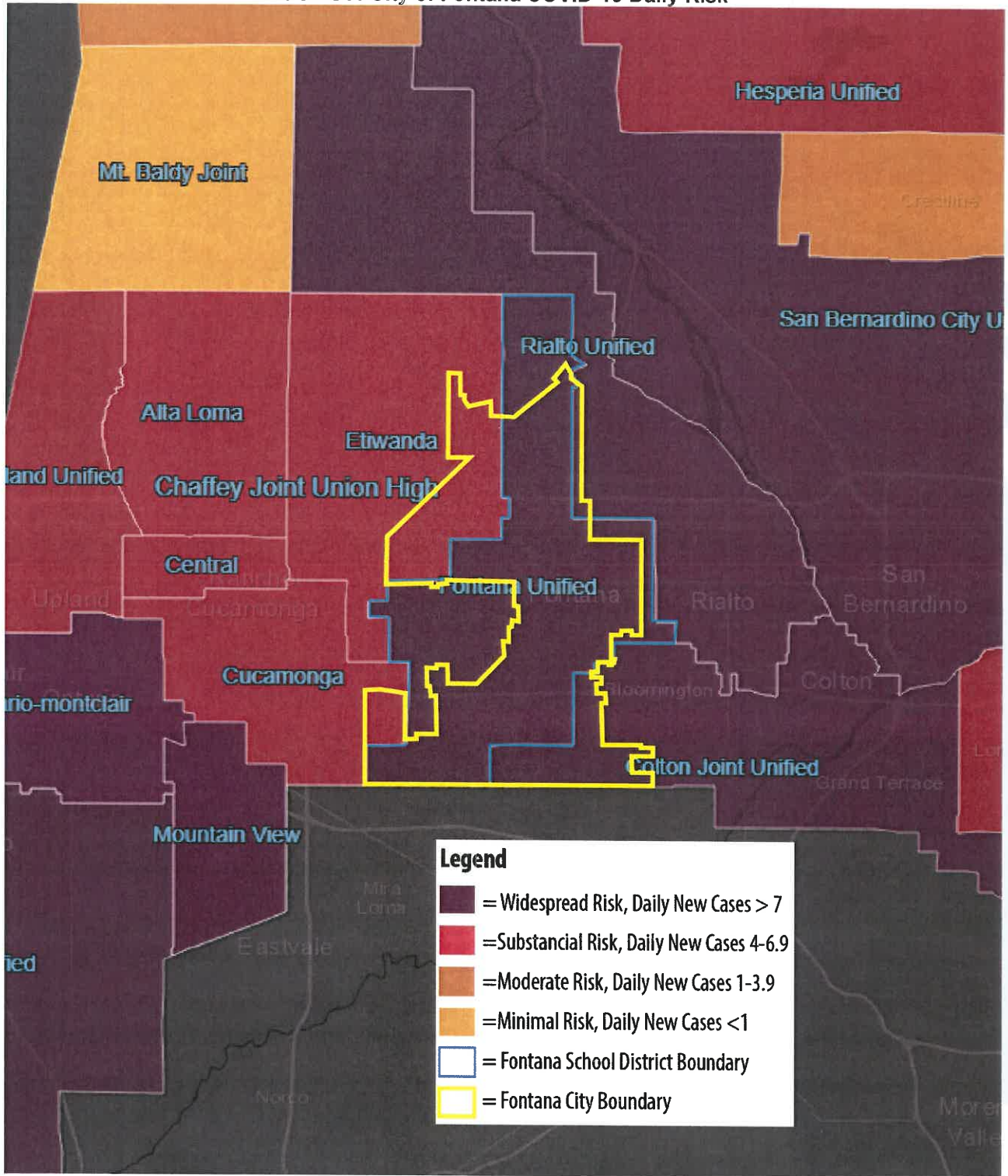
<b>3</b>	<b>Changed Circumstances</b>	A significant and unforeseen change in circumstances has occurred in the local jurisdiction or jurisdictions that merits a revision of the information submitted pursuant to Section 65584. 04(b).
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**(a) CHANGED CIRCUMSTANCES - The novel coronavirus (COVID-19) presents an unforeseen changed circumstance that has severely impacted the City of Fontana, the current and future housing market and impacted the development capacity of the private market to create housing within Fontana.**

The San Bernardino County Public Health Officer and the Board of Supervisors declared a local health emergency on March 10, 2020 to help ensure county government and the public were prepared for the possibility that COVID-19 would appear within the county. Following the County's declaration of a local emergency, on March 19, 2020, the State Public Health Officer issued an order directing all individuals living in the State of California to stay at home except as needed to facilitate authorized activities or to maintain the continuity of operations of critical infrastructure sectors. By July 1, 2020, confirmed cases in the County of San Bernardino had reached 12,746, with a total of 57,203 confirmed cases in October 2020.

Within the City of Fontana, there have been a total 3,560.5 total cases per 100,000 estimating roughly 3,522 cases per community. The City has some of the highest rates of Covid-19 cases in the County, aside from the Cities of Bloomington, Chino, Colton, Ontario, Rialto and San Bernardino City. The Map below displays the current risk (October 2020) in the City of Fontana based total cases, including total cases, outbreak cases, community cases, and youth cases.

FIGURE 7: City of Fontana COVID-19 Daily Risk



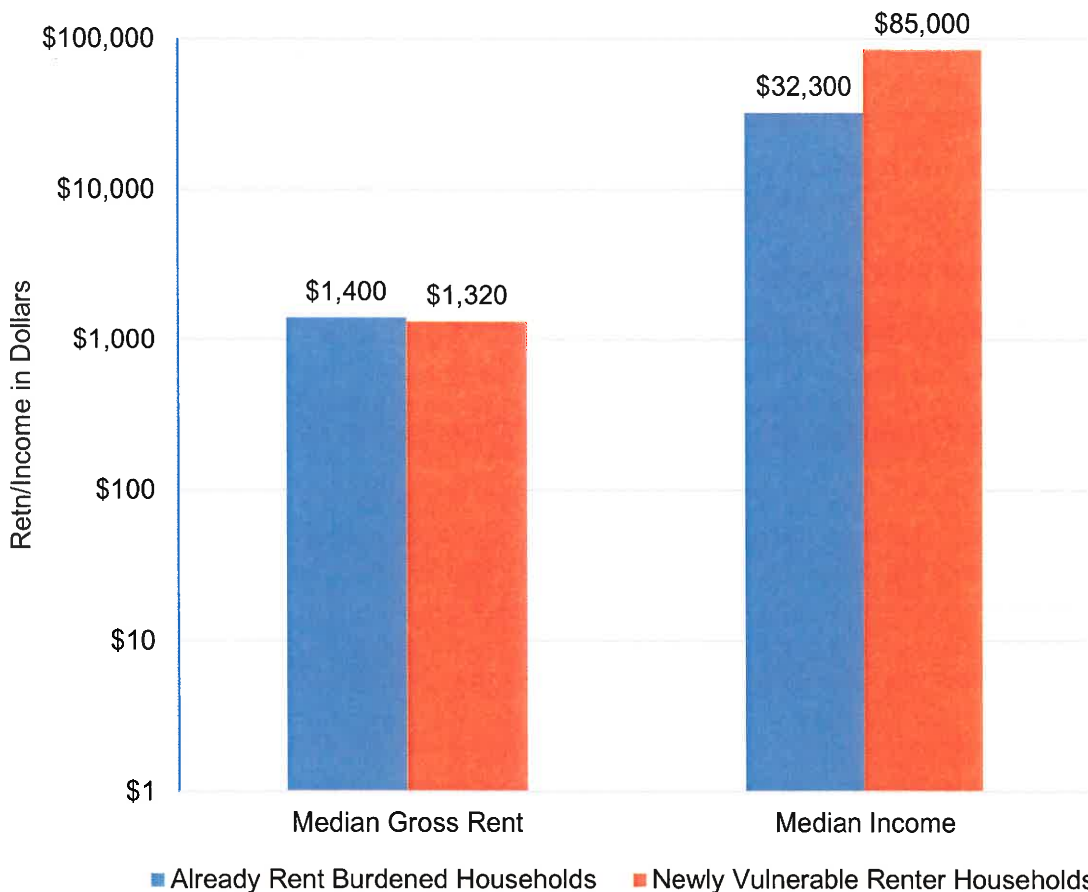
Source: County of San Bernardino COVID-19 Dashboard

According to County wide data, as show in the **Figure 7** above, Fontana has a total of 6,187 cases, 176 outbreak cases, and 737 youth cases (ages 5-19). The relative impacts of COVID-19 on the existing and future housing needs within Fontana 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 Fontana, and the City’s financial ability to assist in lower income housing production.

According to July 2020 research completed by the Pew Research Center<sup>4</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. A report done by the Turner Center for Housing Information the University of California Berkeley, estimate the economic impacts of COVID on renters. Using 2018 American Community Survey microdata, the report identified renter households with at least one worker in an industry likely to be affected by the immediate economic impacts of social distancing and stay-at-home orders.<sup>5</sup> The study found:

- Nearly 16.5 million renter households have at least one worker in an industry likely to be immediately affected by efforts to flatten the curve in the COVID-19 pandemic.
- Among likely-impacted renter households, more than 7.1 million were already experiencing housing cost burdens and are likely to be especially vulnerable.
- Renters in high-cost metro areas are especially likely to struggle with rent shortfalls.

**FIGURE 8: Renter Households Impacted by COVID - the Riverside-San Bernardino- Ontario MSA.**



The data gathered in the report identified 1,161,200 rent burdened households in the state of California, and 96,700 already rent burdened households in the Riverside-San Bernardino- Ontario MSA. Additionally, the report identified 1,183,600 newly vulnerable renter households in the State and 92,500 newly vulnerable

<sup>4</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>5</sup> <https://turnercenter.berkeley.edu/blog/estimating-covid-19-impact-renters>

households in the Riverside-San Bernardino- Ontario MSA. **Figure 8** above displays median income and median gross rent of both existing rent burdened households and newly vulnerable households for the Riverside-San Bernardino- Ontario MSA. The report found that as the economic landscape shifts, renters who are already experiencing cost burden or are newly vulnerable, may need to leave high cost cities or turn to multi-generational living arrangements.

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 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.

Additionally, while renters and homeowners alike are financially affected by the pandemic changing the housing and economic landscape, population projections in the United States are expected to decrease substantially. According to the World Economic Forum, economists are predicting significant negative impacts on GDP, jobs growth and even population sizes.<sup>6</sup> The report states that, according to projections released by the Congressional Budget Office, the predicted population of the U.S. over the next two and a half decades is expected to be substantially impacted by COVID-19. The new 2020 number of a predicted 374 million people living in the U.S. by 2046 is a revision of the 2018 estimate of 384 million. A big factor in the new number is that economists expect birth rates in the country to decline, correlating with higher unemployment rates and an increase in anxiety within the country associated with the pandemic and economic consequences.<sup>7</sup>

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.

COVID-19 presents an unforeseen circumstance which will likely result in Fontana 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.

### C. CONCLUSION

The City of Fontana is committed to accommodating the existing and future needs of its residents. While we are committed to contributing to our collective local, regional and state needs for housing, we have demonstrated that the City's Draft RHNA Allocation is unrealistic, overly excessive and based on faulty assumptions that will result in negative impacts for existing and future residents. Therefore, the City, respectfully objects to the Final Draft RHNA Allocation and methodology used and requests the RHNA Allocation be revised so that it fulfills the objectives identified in the Government Code.

Pursuant to Govt. Code Section 65584.05(b), the City of Fontana states the following revisions to the Final Draft RHNA Allocations are necessary to further the intent of the objectives stated in Govt. Code Section 65584(d). **Table 14** illustrates recommended modifications.

<sup>6</sup> <https://www.weforum.org/agenda/2020/10/united-states-population-predictions-graph-millions-change/>

<sup>7</sup> <https://www.statista.com/chart/23088/population-projections-fall/>

The City has determined that a total equitable RHNA allocation is based on the following reductions in the current draft allocations:

**TABLE 14: Recommended Reduction of RHNA Allocation**

Basis of Fontana Appeal	Reduction of RHNA Allocation
1. SCAG's proposed methodology is inconsistent with the household growth projections determined in the Connect SoCal Plan.	-7,008 units
2. The draft methodology fails to adequately and equitably address local factors.	-3,232 units
3. 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 Fontana.	-323 units
<b>Total</b>	<b>- 10,563 unit reduction</b>

The City of Fontana recommends the following RHNA allocation by income category:

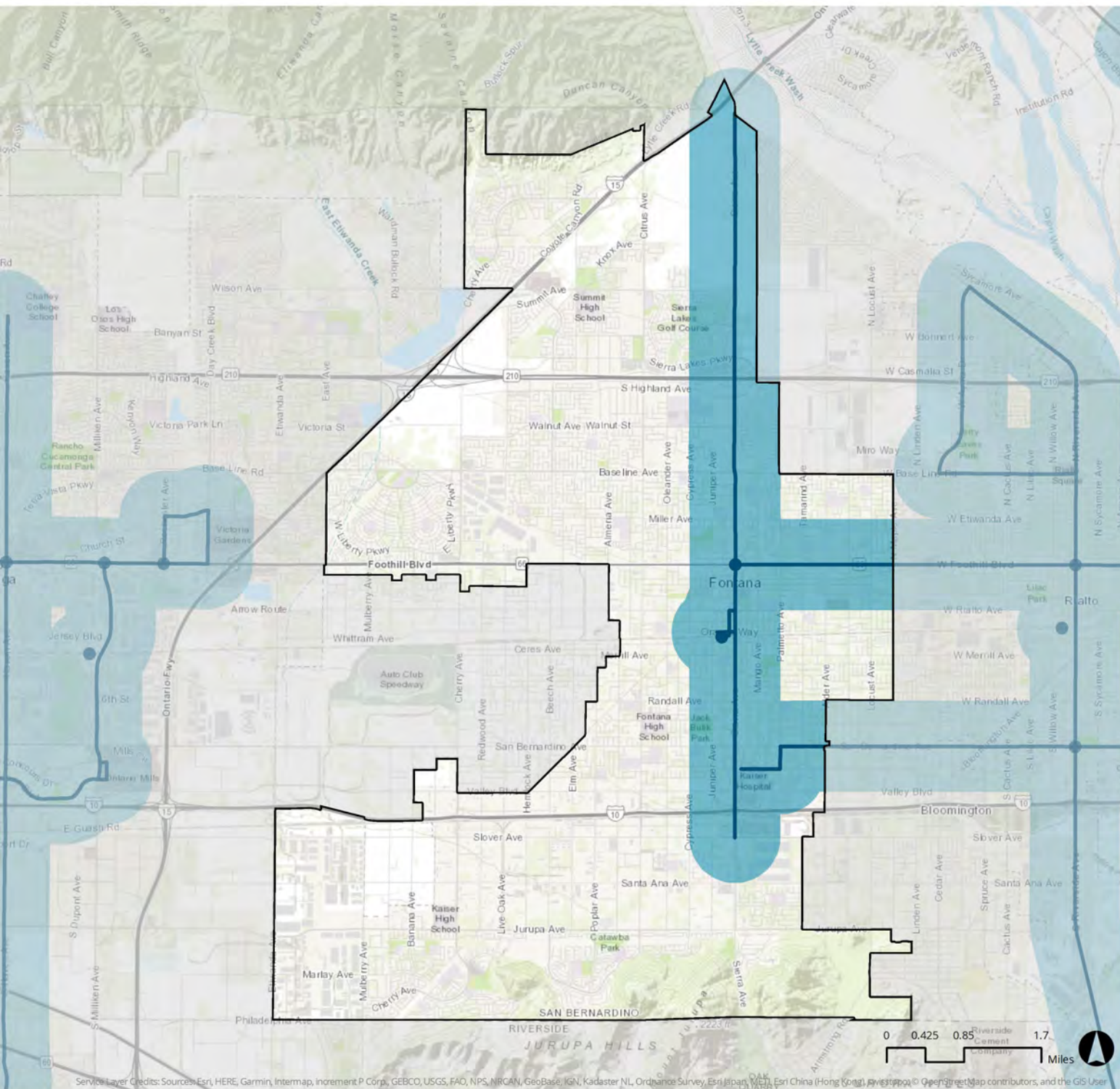
**TABLE 15: Recommended RHNA Allocation by Income Category**

Income Category	Draft SCAG RHNA Allocation	Fontana Recommended RHNA Allocation
Very Low	5,096 Units	2,016 units
Low	2,943Units	1,164 units
Moderate	3,029 Units	1,198 units
Above Moderate	6,409 Units	2,535 units
<b>TOTAL</b>	<b>17,477 Units</b>	<b>6,914 Units</b>

Respectfully Submitted,

Mark Denny  
City Manager

cc: City Council Members, City of Fontana  
Ruben Duran, City Attorney  
Zai AbuBakar, Director of Community Development  
DiTanyon Johnson, Senior Planner



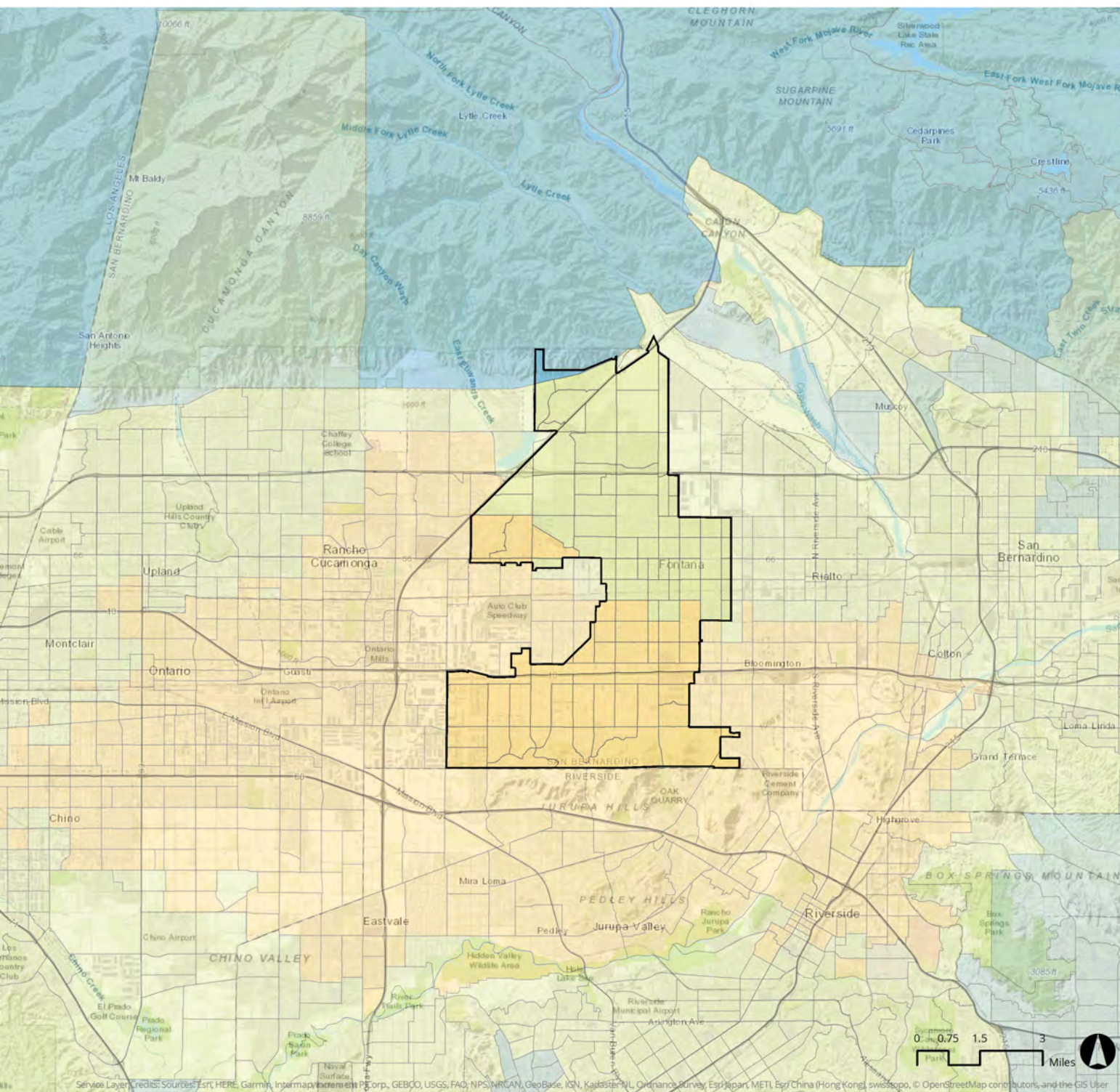
## Major Transit Stops and High Quality Transit Areas in City of Fontana [Year 2045]

- Major Transit Stops
- High Quality Transit Corridors (HQTCS)
- High Quality Transit Areas (HQTAs)

Note: SCAG identifies Major Transit Stops and High Quality Transit Corridors (HQTCS), and their surrounding areas in one-half mile radius distance as specified in Section 21155.(b)(3). Major transit stops and HQTCS are extracted from 2045 plan year data of Connect SoCal. SCAG's High Quality Transit Area (HQTA) is within one-half mile from Major Transit Stops and HQTCS and developed based on the language in SB375; however, freeway transit corridors with no bus stops on the freeway alignment do not have a directly associated HQTA. The RHNA process, per Section 65584 et seq., specifies that SCAG's housing needs allocation plan shall further several objectives including those related to infill development and jobs-housing balance. To that end, SCAG's Regional Council-adopted 6th Cycle Final RHNA Methodology relies on a jurisdiction's forecasted 2045 population within HQTAs to allocate housing need.

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

Disclaimer: The information shown on this map reflect jurisdiction's input submitted during the Local Input and Envisioning Process for the City of Fontana. SCAG shall not be responsible for user's misuse or misrepresentation of this map. For the details regarding the sources, methodologies and data please refer to the SCAG Data/Map Book at [connectsoal.org/Pages/Local-Input-Process.aspx](https://connectsoal.org/Pages/Local-Input-Process.aspx) or contact [RTPLocalInput@scag.ca.gov](mailto:RTPLocalInput@scag.ca.gov).



## TAZ-level job accessibility in and around: City of Fontana [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 RTPLocalIn

**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 (Appeal of the Draft RHNA Allocation for the City of Fontana)

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 (Appeal of the Draft RHNA Allocation for the City of Fontana)



Southern California Association of Governments  
Remote Participation Only  
January 6, 2021

**To:** Regional Housing Needs Assessment (RHNA) Appeals Board

**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 Hemet

**RECOMMENDED ACTION:**

Deny the appeal filed by the City of Hemet (the City) to reduce the draft RHNA allocation for the City by 2,824 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 Hemet requests a reduction of its RHNA allocation by 2,824 units (from 6,450 units to 3,626 units) based on the following issues:

- 1) Application of adopted Final RHNA Methodology for the 6<sup>th</sup> Cycle RHNA (2021 – 2029) - methodology does not further the five objectives listed in Government Code Section 65584(d) and requests an alternative methodology be adopted.
- 2) Existing or projected jobs-housing balance - requests SCAG consider a methodology that focuses on the region's job-housing balance.
- 3) Sewer or water infrastructure constraints - number of units allotted is unobtainable as water and stormwater infrastructure is not available or too costly to build.
- 4) The region's greenhouse gas emissions targets - adding 6,450 residential units to an area with few jobs and transit options would increase highway congestion, reduce air quality, lengthen commute times, increase VMT, and thereby be inconsistent with achieving the region's GHG reduction targets.
- 5) Affirmatively further fair housing - RHNA allocation does not consider socio-economic disadvantages specific to the City and the unintended consequences of overconcentrating low-income housing and therefore does not affirmatively further fair housing.

**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 Hemet’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 content of the adopted RHNA Methodology rather than the application of the methodology, and it presents alternative methodologies which cannot be considered as bases for an appeal. Regarding Issue 2, the RHNA methodology already includes job access as a primary factor in determining a jurisdiction’s draft RHNA allocation. Regarding Issue 3, costs to upgrade and develop appropriate infrastructure cannot be considered by SCAG as a justification for a reduction and evidence from a utility service provider that would preclude the construction of new housing was not demonstrated. Regarding Issue 4, the jurisdiction’s RHNA allocation was assigned in a manner consistent with the development pattern in the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (“Connect SoCal”), which includes the GHG emission reduction targets for the region. Regarding Issue 5, the RHNA methodology addresses regional socio-economic disparity through its social equity adjustment.

## **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 of the draft allocation for the City of Hemet is provided below.

Total RHNA for the City of Hemet: 6,450 units  
Very Low Income: 810 units  
Low Income: 730 units  
Moderate Income: 1,171 units  
Above Moderate Income: 3,739 units

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

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

One comment was received from a local jurisdiction during the 45-day public comment period described in Government Code section 65584.05(c) which specifically addresses the appeal filed by the City of Hemet:

- The City of Corona objects to receiving any potential reallocation of the draft RHNA allocation based on appeals filed by the City of Hemet and the County of Riverside.

In addition, three such comments were received which relate to SCAG 6<sup>th</sup> cycle appeals 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 contends that SCAG failed to determine the jurisdiction's share of the regional housing need in accordance with the Final RHNA Methodology in a manner that furthers the five objectives listed in Government Code Section 65584(d). The City suggests altering the methodology in order to meet these objectives.*

**SCAG Staff Response:** An appeal citing the adopted RHNA Methodology as its basis must appeal the application of the 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. The City has not provided evidence of such a data error or any other misapplication of the adopted RHNA methodology, and thus, the City cannot appeal under this basis. Moreover, appeals shall be based upon comparable data available for all affected jurisdictions and accepted planning methodology and supported by adequate documentation.

Adopted by the SCAG Regional Council on March 5, 2020, the RHNA Allocation Methodology uses SCAG's Growth Forecast as the basis to determine the projected household need component of a jurisdiction's draft RHNA allocation. SCAG's Integrated Growth Forecast process was derived through a two-year process from October 2017 through December 2019 that was based on local input review through surveys and individual meetings with SCAG jurisdictions. As indicated in the background section of this report, SCAG staff fully considered the input provided by the City during the development of the Integrated Growth Forecast and incorporated this input into the development of projected need for the City's draft RHNA Allocation. See also Attachment 1, Local Input and Development of Draft RHNA Allocation.



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.

While the City presents ways to improve the methodology, it does not show how SCAG improperly applied the adopted RHNA Methodology. For this reason, SCAG staff does not recommend a reduction to its draft RHNA allocation based on this factor.

***Issue 2: Existing or projected jobs-housing balance [Government Code Section 65584.04(e)(1)]***

*The City requests that SCAG consider a RHNA allocation for the City that focuses on the region's job-housing balance. The City of Hemet has a high imbalance of housing to nearby jobs with major job centers in Orange, Los Angeles, and San Diego Counties located two hours away leading to high unemployment rates in the City. Constructing high-density housing in an area where there are few jobs fails to recognize the market demand for affordable housing near job centers.*

**SCAG Staff Response:** The 6th Cycle RHNA regional housing need total of 1,341,827 units, as determined by HCD, consists of both "projected need" and "existing need". The majority of the City of Hemet's RHNA allocation comes not from the City's proximity to jobs or transit but instead from its expected future growth or "projected need". As described in Attachment 1, among the total need of 6,450 units for the City of Hemet, the "projected need" for the city is 6,174 units. "Projected need" is intended to accommodate the growth of population and households within the city during the 2021-2029 RHNA period. This calculation is based on the household growth for the comparable RHNA period (2021 to 2029) of the regional transportation plan. 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. Growth forecast data for the City of Hemet was reviewed and approved by the City in January 2019 (see Attachment 2, Data Verification Form).

The adopted RHNA methodology already includes job and transit accessibility as primary factors in determining a jurisdiction's draft RHNA allocation for "existing need". 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 includes jobs outside of the jurisdiction. As described in Attachment 1, from the City of Hemet's median TAZ, it will be possible to reach 1.46% of the region's jobs in 2045 within a 30-minute automobile commute (146,000 jobs, based on Connect SoCal's 2045 regional job forecast of 10,049,000 jobs). Therefore, the City only received a RHNA allocation of 277 units based on job accessibility. The City is not expected to have any share of the region's population in HQTAs in 2045, and therefore received zero units based on transit accessibility. Hence, the local jurisdiction's job-housing balance has already been accounted for in the approved RHNA methodology.

**Issue 3: Sewer or water infrastructure constraints for additional development [Government Code Section 65584.04(e)(2)(A)]**

*The City contends that while land is available for housing, it has significant infrastructure constraints, particularly relating to water supply and stormwater drainage. In most instances the infrastructure is either not available or too expensive to build. Therefore, the number of units allotted to the City is unobtainable.*

**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 any 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 4: The region's greenhouse gas emissions targets [Government Code Section 65584.04(e)(12)]**

*The City of Hemet argues that it is located at the very end of the transportation network in Riverside County. Specifically, it is 20 minutes to the closest freeway, 30 minutes to the closest light rail, and 60 minutes away from any major employment center. Adding 6,450 residential units to an area with*

*few jobs and transit options would only increase highway congestion, reduce air quality, lengthen commute times, increase VMT, and thereby be inconsistent with achieving the regions greenhouse gas reduction targets as provided by the State.*

**SCAG Staff Response:** SCAG allocates both “projected need” and “existing need” in a manner that is consistent with the development pattern in the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal), which includes a GHG emission reduction target for the region. As described in Attachment 1, the majority of the City of Hemet’s RHNA allocation (6,174 units) comes from its expected future growth or “projected need” that was calculated using data that was reviewed and approved by the City in January 2019 (see Attachment 2, Data Verification Form). The 6th cycle RHNA does not change the population growth forecast from Connect SoCal for 2029 (end of RHNA period) or any other year including 2035 for which Connect SoCal is required to meet the greenhouse gas emissions target. The Connect SoCal Forecasted Regional Development Pattern is shown on Exhibit 1 of the Sustainable Communities Strategy Technical Report, p. 13. Specifically, the development pattern includes priority growth areas, incorporated areas, job centers, entitled projects and sphere of influence which together would accommodate 95% of the growth till 2045. The development pattern reflects the strategies and policies contained in Connect SoCal.

While RHNA would also require the City to address existing need (277 units), not included in Connect SoCal, those units are intended to serve the existing population and were allocated based on transit and job access measures derived from Connect SoCal data. Therefore, the RHNA methodology for “existing need” also promotes an efficient development pattern in utilizing public transit, reducing commute distance and contribute to further reduce per capita greenhouse gas emissions. Accordingly, the total allocation for regional housing need (“existing need” and “projected need”) is aligned with the strategies and policies underlying the development pattern in the Connect SoCal, and the RHNA allocation methodology is consistent with meeting the region’s GHG emissions target. For this reason, SCAG staff does not recommend a reduction to Hemet’s draft RHNA allocation based on this factor.

**Issue 5: Affirmatively furthering fair housing**

*The City contends that SCAG failed to adequately consider information relating to affirmatively furthering fair housing pursuant to Government Code § 65584(b)(2) and 65584(d)(5). The City contends that the proposed RHNA allocation does not consider socio-economic disadvantages specific to the City and the unintended consequences of overconcentrating low-income housing. Specifically, the City of Hemet was allocated with 1,540 low-income units even though it has 98.7% of its population within a Low Resource Area, is considered a “disadvantaged community”, and has a medium household income that is significantly lower than its County of Riverside and the SCAG region. The City further argues that the RHNA distribution across income categories for the social*

*equity adjustment is not explained. Therefore, the City finds that the RHNA allocation does not affirmatively further fair housing.*

**SCAG Staff Response:** 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 proportionately high share of households in that income category”. While SCAG staff accepts the assertion that the jurisdiction has a currently disproportionately high percentage of lower income households in comparison to the County and the SCAG region, the RHNA methodology addresses this disparity through its social equity adjustment and inclusion of access to resources as an influencing factor.<sup>1</sup>

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 the City of Hemet, the maximum social equity adjustment of 180% was applied. Therefore, 59% of the jurisdiction’s draft RHNA allocation is assigned for above moderate income housing, 18% for moderate income, and only 11% for low income, and 12% for very-low income housing. The City’s RHNA allocation distribution is lower than its percentage of population currently in low and very-low resource census tracts (98.75%) as identified by the Tax Credit Allocation Committee (TCAC) opportunity scores used elsewhere in the RHNA methodology and lower than the County of Riverside’s distribution of very low income units 25% and low income units 16%.

It is important to note that while the social equity adjustment is meant to prevent the overconcentration of low income units in one area, it does not completely remove the need for affordable housing in the City; therefore, 23% of the City’s RHNA allocation was still assigned to accommodate low income housing units. 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 the jurisdiction’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-

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<sup>1</sup> The complete Final RHNA Methodology can be found at the RHNA website using the link below:  
<http://www.scag.ca.gov/programs/Documents/RHNA/SCAG-Final-RHNA-Methodology-030520.pdf>

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4872Y0.02: Regional Housing Needs Assessment).

**ATTACHMENT(S):**

1. Local Input and Development of Draft RHNA Allocation (City of Hemet)
2. City of Hemet Appeal Request Form and Supporting Documents
3. Map of Job Accessibility in the City of Hemet (2045)
4. Comments received during the comment period
5. City of Hemet Data Verification Form

Southern California Association of Governments  
Remote Participation Only  
**City of Hemet**  
**January 6, 2021**

## **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 Hemet 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 Hemet'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 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 Hemet, the anticipated number of households in 2020 was 35,216 and in 2030 was 42,465 (growth of 7,249 households). In February 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 Hemet 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 Hemet 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 Hemet 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 Hemet

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 Hemet received its draft RHNA allocation on September 11, 2020. Application of the RHNA methodology yields the draft RHNA allocation for the City of Hemet 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>Hemet city statistics and inputs:</b>	
Forecasted household (HH) growth, RHNA period: <i>(2020-2030 Household Growth * 0.825)</i>	5980
Percent of households who are renting:	42%
Housing unit loss from demolition (2009-18):	15
Adjusted forecasted household growth, 2020-2045: <i>(Local input growth forecast total adjusted by the difference between the RHNA determination and SCAG's regional 2020-2045 forecast, +4%)</i>	18,932
Percent of regional jobs accessible in 30 mins (2045): <i>(For the jurisdiction's median TAZ)</i>	1.46%
Jobs accessible from the jurisdiction's median TAZ (2045): <i>(Based on Connect SoCal's 2045 regional forecast of 10.049M jobs)</i>	146,000
Share of region's job accessibility (population weighted):	0.07%
Jurisdiction's HQTAs population (2045):	-
Share of region's HQTAs population (2045):	0.00%
Share of population in low/very low-resource tracts:	98.75%
Share of population in very high-resource tracts:	0.05%
Social equity adjustment:	180%

<b>Calculation of Draft RHNA Allocation for Hemet city</b>	
Forecasted household (HH) growth, RHNA period:	5980
Vacancy Adjustment <i>(5% for renter households and 1.5% for owner households)</i>	179
Replacement Need	15
<b>TOTAL PROJECTED NEED:</b>	<b>6174</b>
Existing need due to job accessibility (50%)	277
Existing need due to HQTA pop. share (50%)	0
Net residual factor for existing need <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>	0
<b>TOTAL EXISTING NEED</b>	<b>277</b>
<b>TOTAL RHNA FOR HEMET CITY</b>	<b>6450</b>
Very-low income (<50% of AMI)	810
Low income (50-80% of AMI)	730
Moderate income (80-120% of AMI)	1171
Above moderate income (>120% of AMI)	3739

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 Hemet represents zero percent 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 jobs accessibility. From the City of Hemet's median TAZ, it will be possible to reach 1.46% of the region's jobs in 2045 within a 30-minute automobile commute (146,000 jobs, based on Connect SoCal's 2045 regional job forecast of 10,049,000 jobs).

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: \_\_\_\_\_



# City of Hemet

PLANNING DIVISION.

445 EAST FLORIDA AVENUE · HEMET, CALIFORNIA 92543 (951) 765-2375

October 26, 2020

Honorable Bill Jahn  
President, Regional Council  
Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, CA 90017

Subject: Appeal of the RHNA Allocation for the City of Hemet

Dear President Jahn:

The City of Hemet respectfully requests that SCAG reconsider the final RHNA allocation. The City does not agree that the RHNA Methodology established and approved by SCAG has not achieved a final outcome in a manner that does not under undermine the five objectives listed in Government Code Section 65584(d) and as briefly stated in the key points listed.

- The City of Hemet is requesting that SCAG consider a RHNA allocation for the City that uses the region's job-housing balance as its core.
- The City's median income is among the lowest in the region. Hemet has among the lowest housing costs and lowest median income in the entire SCAG region. Attempting to construct high-density, low-income housing in Hemet is likely to simply create housing that can only exist with public assistance and where few jobs available, ensuring that residents of such housing are ever more dependent on public assistance.
- The proposed RHNA allocation for the City of Hemet does not consider the socio-economic disadvantages and unintended consequence of overconcentrating low-income housing and proliferation of patterns of segregation without addressing the need for socio-economic equity.
- The City has significant infrastructure issues, particularly relating to water supply and stormwater drainage that are complicated and costly to fix. Although land is available, in most instances the infrastructure is not.
- The City of Hemet is located in an eastern "cul-de-sac" of Riverside County is at the very end of the transportation network. Major job centers in Orange, Los Angeles, and San Diego Counties are two hours or more away. Adding 6,450 new residential units in the community, with the lack of jobs and transit options would only increase highway congestion, reduce air quality, lengthen commute times, and thereby be inconsistent with achieving the regions greenhouse gas reduction targets as provided by the State.

Statement: The requested revision to reduce the number housing units in the City of Hemet is necessary to further the intent of the objectives listed in Section 65584 of the Government Code based on the following findings:

FINDINGS: 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) as described in the findings below.

Objective 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.

SCAG has done an admirable job of recognizing and explaining the complexities of providing affordable housing in Southern California; however, the RHNA allocation methodology does not address marketplace demand and the inherent differences in our regional communities. Using population as the basis for housing demand and assigning the same percentages for each jurisdiction in the SCAG region does not result in a fair and equitable distribution of RHNA. Therefore, the City of Hemet is requesting that SCAG develop consider a RHNA allocation for the City that uses the region's job-housing balance as its core. In your April 2001 report entitled "The New Economy and Jobs/Housing Balance in Southern California" SCAG documented the geographic imbalance between jobs and housing and made a number of recommendations including promoting infill housing in Los Angeles and Orange Counties and wealth-generating jobs in the Inland Empire.

A more realistic methodology is to allocate the RHNA based on a jurisdiction's job-housing balance. The issue is the lack of new housing construction in major job centers and the inability of workers to purchase or rent that housing. Building new units in the housing-rich Inland Empire, without commensurate job growth or transit options, will only increase highway congestion, reduce air quality, and lengthen commute times. In conversations with HCD and SCAG staff, it is clear that policy is not swayed by arguments about fairness, community character, local capacity, historical building patterns, or alternate analyses. However, there is a recognition that employment is the driver of housing demand. A RHNA methodology that is based on jobs-housing balance is feasible.

The current housing predicament is largely due to the lack of housing construction within major job centers. Restricted supply and increased demand only results in increased housing costs. This exacerbates the ability of workers to purchase or rent housing in reasonable proximity to jobs. Allocating urban-scale units in the Inland Empire, where Hemet is located, fails to recognize sub-regional market demand.



Without commensurate job growth or alternative transit options highway congestion will increase, air quality will continue to degrade, and commute times will only increase. Furthermore, the City has significant infrastructure issues, particularly relating to water supply and stormwater drainage that are complicated and costly to fix.

It should be noted that demand for traditional single family detached homes remains high and can only be accommodated in suburban and exurban communities. Although land is available, in most instances the infrastructure is not. Due to the high cost of installing backbone facilities, the development community has been exceedingly cautious in constructing product where lower per unit price points do not offset the risk associated with the development process. The resulting perception of higher risk and lower margins reduces the availability of financing.

The City of Hemet is located in an eastern “cul-de-sac” of Riverside County. It is 20 minutes to the closest freeway, 30 minutes to the closest light rail, and 60 minutes to any major employment centers. Major job centers in Orange, Los Angeles, and San Diego Counties are two hours or more away.

The City’s median income is among the lowest in the region. Hemet has among the lowest housing costs and lowest median income in the entire SCAG region. Attempting to construct high-density, low-income housing in Hemet is likely to simply create housing that can only exist with public assistance and where few jobs available, ensuring that residents of such housing are ever more dependent on public assistance.

Depending on density and the type of construction materials utilized, urban style residential development is mostly cost prohibitive. Raising the purchasing power of the area by expanding higher wage employment opportunities is needed to induce this type of residential product. Regardless of product type and pricing, without alternative transit options and an increased local employment base, highway congestion will increase, air quality will continue to degrade, and commute times will only increase.

Objective 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.

- The State of California Air Resources Board set the per capita GHA emission reduction targets from automobile and light trucks for the SCAG region by 8% below 2005 per capita emissions levels by 2020 and 19% by 2035. The City of Hemet is located in an eastern “cul-de-sac” of Riverside County. It is 20 minutes to the closest freeway, 30 minutes to the closest light rail, and 60 minutes to any major employment centers. Hemet is at the very end of the transportation network. Major job centers in Orange, Los Angeles, and San Diego Counties are two hours or more away. Adding 6,450 new residential units in the community, with the lack of jobs and transit options would only increase highway congestion, reduce air quality, lengthen commute times, and

thereby be inconsistent with achieving the regions greenhouse gas reduction targets as provided by the State.

- Socio-Economic Equity: According to the CA Tax Credit Allocation Committee (TCAC), 98.7% of the City’s population is located within a Low Resource Area with “High Segregation and Poverty. Additionally, per CalEPA the City of Hemet is a disadvantaged community. Although the City understands the intent of the social equity adjustment redistributed to other High Resource communities, the total RHNA allocation of 6,540 units does not consider the socio-economic disadvantages that would negatively impact efficient patterns of development, such as the overconcentration of low-income housing without addressing the need for socio-economic equity. The City has approved 3,231 residential units including over 300 apartment units, but only 395 single-family homes were actually built in the past five years and over 3,000 jobs have been lost. This does not factor additional jobs lost due to the Covid-19 pandemic. Builders are reporting that it is financially difficult, if not impossible, to build in Hemet because the cost to build exceeds the value of the residential units in the City.
- Greenhouse gas target reductions Adopting an unattainable RHNA for the City that will once again doom the SCAG region and its cities to a failure in building residential units as suggested by the RHNA. Without transit resources and infrastructure to support new development, a RHNA allocation of 6,540 units within the City would only increase highway congestion, reduce air quality, lengthen commute times, and thereby be inconsistent with achieving the regions greenhouse gas reduction targets as provided by the State. Due to the lack of jobs within the community, the City of Hemet residents who would have to travel to jobs rich areas to work because local jobs are not available. It would also run counter to the recent State-mandated Vehicle Miles Traveled (VMT) standard for measuring traffic impacts.

Objective 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.

- The allocation of housing did not consider the geographic and socio-economic differences between cities. SCAG has attempted to address the disparity with the social equity adjustment. Consequently, the City was allocated a combined total of 1,540 units in the very-low to low-income category, which would result in an overconcentration of low-income housing within the City, and would proliferate patterns of segregation and poverty. The City of Hemet Median Household Income as reported in the 2018 American Community Survey 5-Year Estimates is \$39,179.00, which is within the very-low income category, and significantly lower as compared to the Area Median Income of \$75,300 for Riverside County. As reported by the Census, the median monthly household

cost in the City of Hemet is \$1,368.00 and monthly gross rental cost is \$1,066.00, which is substantially lower as compared to the SCAG region. The housing costs are predominately within the low to moderate income category. Therefore, affordable housing units relative to low-wage workers is not the issue in the City of Hemet, but rather the lack of high-quality jobs to support a growing population, in addition an unemployment rate of 14% (ACS 2018 5-Year Estimate), which is significantly higher than the State unemployment rate of 6.7%, and symptomatic of job scarcity. This does not include the loss of jobs due to the recent Covid-19 Pandemic. The greater issue is the lack of new affordable housing construction in Major Job Centers and the inability of workers to purchase or rent that housing. A more realistic methodology is to allocate the RHNA based on a jurisdiction's job-housing balance.

Objective 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.

- SCAG recognized that some cities have a higher concentration of lower income households than other cities within the same county. By applying the current percentages to the RHNA allocation, lower income communities would be allocated higher numbers of low-income housing units. To correct this, SCAG applied a social equity adjustment to more fairly distribute the allocation of lower income units across the county, which resulted in a RHNA allocation of 1,540 very-low and low-income units to the City of Hemet.
- The City of Hemet Median Household Income as reported in the 2018 American Community Survey 5-Year Estimates is \$39,179.00, which is significantly lower as compared to the Area Median Income of \$75,300 for Riverside County. The distribution of income categories does not consider the geographic and socio-economic differences between cities. SCAG has attempted to address the disparity with the social equity adjustment, but the nexus for the percentages used to determine the RHNA and its distribution across the income categories is not explained. As reported by the Census, the median monthly household cost in the City of Hemet is \$1,368.00 and monthly gross rental cost is \$1,066.00, which is notably lower as compared to the SCAG region. As reported by the American Community Survey, the Median Value of owner-occupied housing units is \$175,700.00, which is also significantly lower comparatively within the SCAG region.
- The disproportionate allocation of 1,540 very-low and low-income units within an already low-income community is not economically feasible. Although the City has explored and participated in most State and Federal programs offered, it is still struggling to recover from the Great Recession. Many of our residents are underemployed or unemployed. The City has approved 3,231 residential

units including over 300 apartment units, but only 395 single-family homes were actually built in the past five years and over 3,000 jobs have been lost. This does not factor additional jobs lost due to the Covid-19 pandemic. Builders are reporting that it is financially difficult, if not impossible, to build in Hemet because the cost to build exceeds the value of the residential units in the City.

Objective 5: Affirmatively furthering fair housing.

- Although the social equity adjustment defined by the state Tax Credit Allocation Commission opportunity map was intended to provide a fair and equitable adjustment, it did not fairly translate in the number of affordable units allocated to the City and did not consider that 63% of the City’s population is within the very-low or low-income range. The City of Hemet Median Household Income as reported in the 2018 American Community Survey 5-Year Estimates is \$39,179.00, which is significantly lower as compared to the Area Median Income of \$75,300 for Riverside County. The distribution of income categories does not consider the geographic and socio-economic differences between cities. Not only is the allocation of 1,540 very-low and low-income units within an already low-income community disproportionate, it further proliferates the patterns of segregation, and increases the economic disadvantages, and further complicates the market conditions within the community. Therefore, the City finds that the RHNA allocation (distribution of income categories) does not affirmatively further fair housing.

(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:

- As summarized in the findings above and as provided by the City in prior correspondence, SCAG failed to consider information submitted by the local jurisdiction outlined in the areas of concern listed below.
  - The jurisdiction’s existing and projected jobs and housing relationship.
  - The opportunities and constraints to development of additional housing as follows:
    - 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.

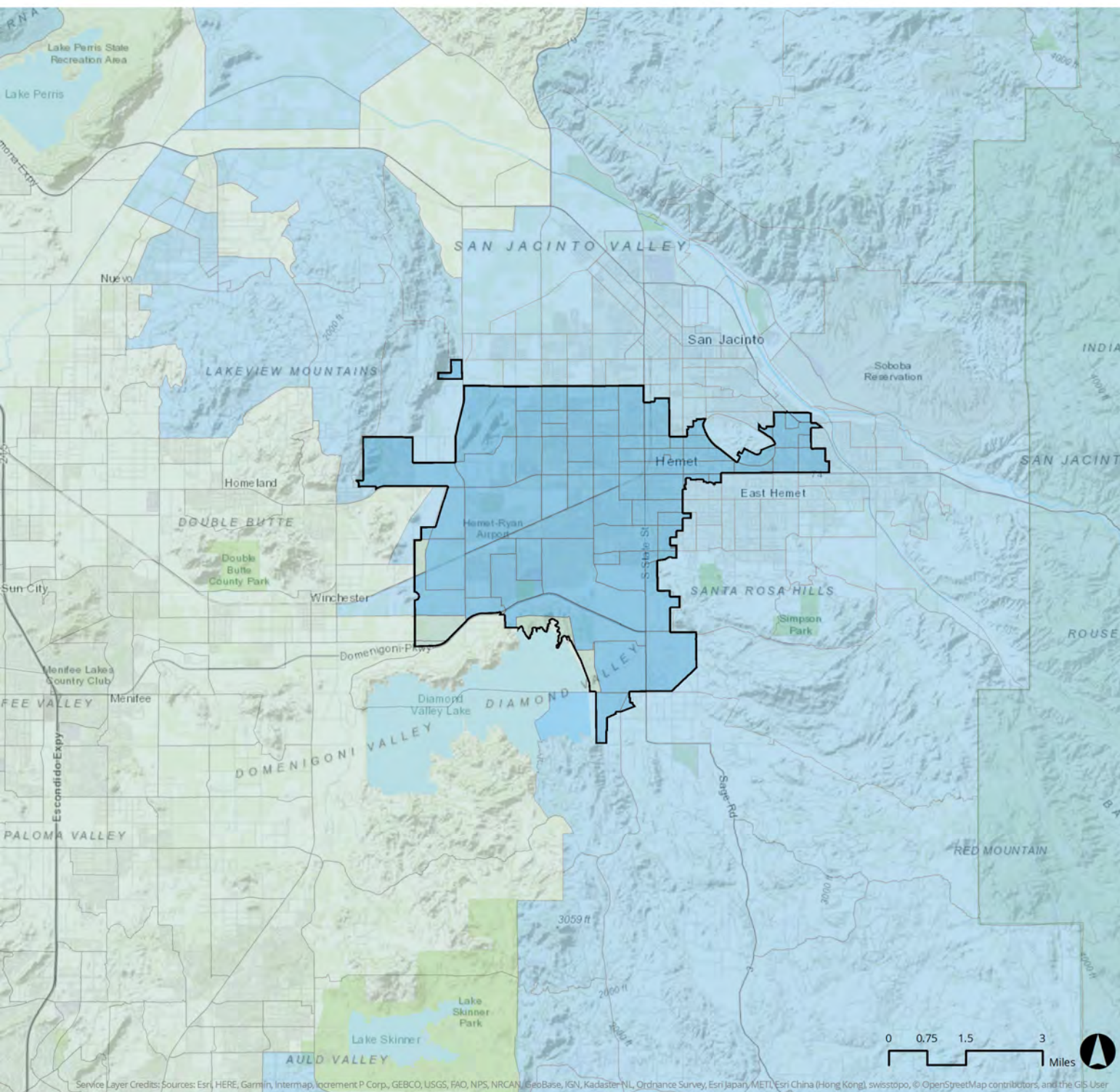
- The percentage of existing households at each of the income levels listed in subdivision (e) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent.
- The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080, to be met by SCAG's Connect SoCal Plan.

Hemet strongly encourages SCAG to design a jobs-housing RHNA allocation option for the City of Hemet that acknowledges the socio-economic constraints, jobs to housing imbalance, and lack of transit and infrastructure in our community.

Sincerely,



H.P. Kang  
Community Development Director



## TAZ-level job accessibility in and around: City of Hemet [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 RTPLocalIn



COMMUNITY DEVELOPMENT DEPARTMENT  
"Promoting and Sustaining Quality Development"

400 S. Vicentia Avenue, Corona, California 92882  
Phone: (951) 736-2434  
[www.CoronaCA.gov](http://www.CoronaCA.gov)

December 10, 2020

RHNA Appeals Board  
Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, CA 90017  
Sent via [housing@scag.ca.gov](mailto:housing@scag.ca.gov)

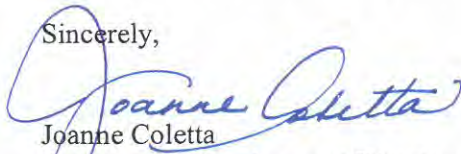
**RE: Appeal of the RHNA Allocation – Comment Letter**

Dear RHNA Appeals Board:

The City of Corona submits this comment letter as an objection to receiving any potential reallocation of the draft RHNA allocation issued on March 5, 2020, that would result in the City receiving a higher RHNA allocation due the RHNA appeals filed by the City of Hemet and County of Riverside. It is the City's understanding that successful appeals of the RHNA allocation would be reallocated to the region in which the appeal was granted. Western Riverside County received a total RHNA allocation of 94,869 units, which was allocated among its 15 jurisdictions including unincorporated Riverside County. SCAG's final methodology on the RHNA allocation took into consideration the public comments from the WRCOG region regarding the need for housing closest to job centers and to public transportation. This resulted in increased shares of lower income RHNA to jurisdictions that have higher housing costs in addition to half of the *existing need* portion of the methodology based on the jurisdiction's share of the region's estimated jobs in 2045.

In the appeals filed by the City of Hemet and the County of Riverside, neither agency indicates the number of housing units being appealed. The appeals are basically against the RHNA allocation issued to the jurisdiction for the reasons cited in their letters. The appeals give no indication as to the number of housing units that could be potentially reallocated to the jurisdictions within Western Riverside County if the appeals are granted by SCAG. Therefore, the City of Corona strongly objects to the reallocation of housing units within the WRCOG region that would increase the City's RHNA from the March 5, 2020 draft allocation due to the appeals filed by the City of Hemet and Riverside County.

Sincerely,

  
Joanne Coletta  
Community Development Director  
[Joanne.Coletta@CoronaCA.gov](mailto:Joanne.Coletta@CoronaCA.gov)

CC: City Manager Jacob Ellis  
Assistant City Manager Roger Bradley

Attachment: Comments received during the comment period (Appeal of the Draft RHNA Allocation for the City of Hemet)

**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 (Appeal of the Draft RHNA Allocation for the City of Hemet)

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 (Appeal of the Draft RHNA Allocation for the City of Hemet)

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

Date: January 21, 2019

Page 1

A - Contact & Background Information

This Represents Communication: \_\_\_\_\_ From the Jurisdiction of \_\_\_\_\_ to SCAG

<b>Jurisdiction Contact Person:</b> Deanna Elliano <b>Position:</b> Community Development Director <b>Email:</b> DElliano@cityofhemet.org <b>Phone:</b> 951-765-3819	<b>Background Information:</b> <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)  <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)
<b>Additional Background, if any, based upon Previous Communications:</b> _____ _____	

B - Action Items

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

**Submit to SCAG:**

<input type="checkbox"/> Provide Input on SCAG's Core Geographic Data	<input type="checkbox"/> Other, please specify _____
<input type="checkbox"/> Provide Input on SCAG's Core Demographic Data	_____
<input type="checkbox"/> Provide Input on Supplemental Data Elements	_____

C - Data Type

**With Relation to SCAG s:**

<b>Core Geographic Data:</b> <input type="checkbox"/> General Plan Land Use <input type="checkbox"/> Zoning <input type="checkbox"/> Existing Land Use <input type="checkbox"/> Specific Plan Land Use <input type="checkbox"/> Endangered Species and Plants* <input type="checkbox"/> Open Space and Parks* <input type="checkbox"/> Flood Areas* <input type="checkbox"/> Natural Community and Habitat Conservation Plans* <input type="checkbox"/> Farmland* <input type="checkbox"/> Coastal Inundation (Sea Level Rise)* <input type="checkbox"/> Major Stops and High Quality Transit Corridors* <input type="checkbox"/> Transit Priority Areas* <input type="checkbox"/> Regional Bikeways <input type="checkbox"/> Regional Truck Routes <input type="checkbox"/> City Boundary* <input type="checkbox"/> Sphere of Influence* <input type="checkbox"/> Census Tracts** <input type="checkbox"/> Transportation Analysis Zone (TAZ) Boundaries** <input type="checkbox"/> Entitlements <input type="checkbox"/> Potential Infill Sites	<b>Core Demographic Data:</b> <input type="checkbox"/> Population <input type="checkbox"/> Households <input type="checkbox"/> Employment <b>Year:</b> <input type="checkbox"/> 2016 <input type="checkbox"/> 2020 <input type="checkbox"/> 2030 (Input needed at Jurisdictional level only) <input type="checkbox"/> 2035 <input type="checkbox"/> 2045 <b>Geographic Level:</b> <input type="checkbox"/> Jurisdictional Level <input type="checkbox"/> Transportation Analysis Zone (TAZ) <input type="checkbox"/> Other Geographic Level (Please Specify): _____																		
<b>Supplemental Data Elements (available for review June 2018):</b> <table style="width:100%"> <tr> <td><input type="checkbox"/> Zoning Overlay Areas</td> <td><input type="checkbox"/> Corridor Plans</td> </tr> <tr> <td><input type="checkbox"/> Community Design Overlays</td> <td><input type="checkbox"/> Special Districts</td> </tr> <tr> <td><input type="checkbox"/> Community Land Trusts</td> <td><input type="checkbox"/> Bike/Ped Volume Data***</td> </tr> <tr> <td><input type="checkbox"/> Historic Preservation Areas</td> <td><input type="checkbox"/> Ped Trails/Sidewalk Data***</td> </tr> <tr> <td><input type="checkbox"/> Bike Sharing Facilities</td> <td><input type="checkbox"/> Public Health Data***</td> </tr> <tr> <td><input type="checkbox"/> Bike Stations</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Car-Sharing Parking Sites</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Joint Public/Private Developments for Affordable Housing</td> <td></td> </tr> <tr> <td><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	
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<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: City of Hemet Data Verification Form (Appeal of the Draft RHNA Allocation for the City of Hemet)





Southern California Association of Governments  
Remote Participation Only  
January 6, 2021

**To:** Regional Housing Needs Assessment (RHNA) Appeals Board

**EXECUTIVE DIRECTOR'S  
APPROVAL**

**From:** Ma'Ayn Johnson, Regional Planner Specialist,  
(213) 236-1975, johnson@scag.ca.gov

**Subject:** Appeal of the Draft Allocation for the County of Riverside  
(Unincorporated)

**RECOMMENDED ACTION:**

Partially approve the appeal filed by the County of Riverside to reduce the draft RHNA allocation for the County of Riverside (unincorporated areas) by 215 units, for a total draft RHNA allocation of 40,553 units.

**STRATEGIC PLAN:**

This item supports the following Strategic Plan Goal 1: Produce innovative solutions that improve the quality of life for Southern Californians. 2: Advance Southern California's policy interests and planning priorities through regional, statewide, and national engagement and advocacy.

**SUMMARY OF APPEAL(S):**

The County of Riverside requests an unspecified reduction of its RHNA allocation of 40,768 residential units based on the following seven issues:

- 1) Application of the adopted Final RHNA Methodology for the 6<sup>th</sup> Cycle RHNA (2021 – 2029)
- 2) Sewer or water infrastructure constraints for additional development
- 3) Availability of land for urban development or conversion to residential use
- 4) Lands protected from urban development under existing federal or state programs
- 5) High housing cost burdens
- 6) The region's greenhouse gas emissions targets
- 7) Changed circumstances

The County of Riverside requests a reduction of its RHNA allocation but does not specify the number of units for reduction.

**RATIONALE FOR STAFF RECOMMENDATION:**

SCAG Staff has reviewed the appeal and recommends a reduction of 215 units to the County of Riverside's RHNA allocation. The application of the RHNA methodology inadvertently included

**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*



projected growth from March Joint Powers Authority. However, the County does not provide sufficient evidence to support its argument that it cannot accommodate its draft RHNA allocation due to sewer and water infrastructure capacity, availability of land, high housing cost burdens, and its greenhouse gas emission targets.

## **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 County of Riverside (unincorporated areas): 40,768 units  
Very Low Income: 10,399 units  
Low Income: 6,648 units  
Moderate Income: 7,371 units  
Above Moderate Income: 16,350 units

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

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

One comment was received from a local jurisdiction during the 45-day public comment period described in Government Code section 65584.05(c) which specifically addresses the appeal filed for the County of Riverside:

- The City of Corona objects to receiving any potential reallocation of the draft RHNA allocation based on appeals filed by the City of Hemet and the County of Riverside.

In addition, three such comments were received which relate to SCAG 6<sup>th</sup> cycle appeals 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 County indicates that it is appealing its draft RHNA allocation based on an incorrect application of the adopted Final RHNA Methodology. It alleges that the County of San Bernardino (unincorporated areas) is similar to the County of Riverside (unincorporated areas) in population, land availability, growth, infrastructure, nature, and other factors. The County of Riverside argues that because the County of San Bernardino has 80 percent fewer assigned draft RHNA units than the County of Riverside despite the similarities between the two jurisdictions, “SCAG has failed to apply the RHNA methodology consistently and must address this inconsistency.”*

*Additionally, the County of Riverside indicates that the previous versions of draft RHNA documents included data from the March Joint Powers Authority (JPA) with the data from the County. The County writes that March JPA is its own land use authority with its own General Plan. The appeal states that if the County was allocated any units belonging to March JPA, the RHNA methodology was applied inappropriately and that SCAG failed to determine the County’s share of RHNA allocation correctly.*

**SCAG Staff Response:** The adopted Final RHNA Methodology considered several components to determine housing need, including factors such as job access and transit access, and applied this methodology consistently to all jurisdictions in the SCAG region. While the County of Riverside claims that it has a high degree of similarity with a nearby jurisdiction, it has not provided any evidence as to how the application of the RHNA methodology would render a different draft RHNA allocation for either jurisdiction from what was already determined. A comparison of the RHNA allocations of two jurisdictions based on factors outside of the adopted RHNA methodology is not a grantable appeal under the application of the Final RHNA methodology.

In regard to March JPA, the County’s assertion is correct in that March JPA has its own land use authority that is outside the County’s jurisdiction. The March JPA Planning Department manages its own General Plan and Development Code. March JPA also has its own housing element and conducts its own permitting process for residential activity. Because of this, the County of Riverside does not receive “credit” toward meeting their RHNA allocation when residential permits are issued by March JPA because they are not the body that issues the permits. This situation is similar to the inclusion of growth from Tribal Lands. Because Tribal Nations are sovereign nations and jurisdictions do not have permitting authority nor do they receive credit for Tribal Land residential activity, in

SCAG's 6<sup>th</sup> cycle final RHNA methodology growth from Tribal Lands are not assigned to any particular jurisdiction and are instead included in the regional household figures.

While a methodology component such as job access or transit access generated by March JPA would not have any impact on the County's RHNA allocation, projected household growth generated by March JPA that was included in the County's projected household growth would have an impact. SCAG's preliminary growth forecast indicated that March JPA has 750 households in 2020 and 1,010 households in 2030. Multiplying the growth over this period by 0.825 to reflect the 8.25 year 6<sup>th</sup> cycle RHNA projection period (the same approach taken to for projected need throughout the RHNA methodology) would indicate a total projected growth for March JPA of 215 units. ***Given that the County does not receive credit for March JPA residential activity yet the projected growth for the March JPA was included in the County's projected housing need, SCAG staff recommends that the County's projected housing need, and thus its draft RHNA allocation, be reduced by 215 units to ensure that the application of the RHNA methodology was fairly applied to the County.*** This is consistent with the application SCAG used for the inclusion of Tribal Land growth in the adopted RHNA methodology. The recommended reduction also meets the objectives of Government Code 65584(d) as it would be compliant with the adopted final RHNA methodology, which was found by HCD to further those objectives.

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

*The County of Riverside indicates in its appeal that the unincorporated areas of the County are mostly rural in nature. Any development that occurs within its jurisdiction has to pay for their own infrastructure. The County argues that these areas lack sewer and water systems to support "urban-type high-density housing that is needed to support a large allocation of units." It adds that adding its draft RHNA allocation in areas that lack basic infrastructure will cause "additional strain on the already over-burdened existing infrastructure" and on their existing facilities. The County also notes that they have relayed this information to SCAG "through countless opportunities" and that the RHNA allocation "still does not appear to incorporate such planning factors...therefore, SCAG failed to consider information provided within comments or during prior allocations."*

**SCAG Staff Response:** Government Code Section 65584(e)(2)(A) indicates that, to the extent sufficient data is available, the following factor shall be included 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 this factor to apply, 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 sewer and water constraints mentioned by the jurisdiction, it is not evident that any water provider has rendered a decision that would prevent the jurisdiction from providing necessary infrastructure. In addition, costs to upgrade and develop appropriate water and sewage infrastructure cannot be considered by SCAG as a justification for a reduction since the RHNA allocation only requires a jurisdiction to plan and zone for its determined housing need and is not required to actually develop the allocated units. For these reasons, SCAG staff does not recommend a housing need reduction based upon this planning factor.

**Issues 3 and 4:** Availability of land suitable for urban development or for conversion to residential use [Government Code Section 65584.04(e)(2)(B)] and lands protected from urban development under existing federal or state programs [Government Code Section 65584.04(e)(2)(C)].

*The County of Riverside indicates in its appeal that its allocation is out of proportion to its ability to provide for urban-scale development. No other statements or evidence have been provided in support of these appeal factors.*

**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 County 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 County’s projected growth.

Besides the statement that its allocation is “out of proportion to its ability to provide for urban-scale development”, no additional statements or evidence has been provided to support the County’s assertion that it cannot accommodate its allocated need.

Furthermore, it is presumed that planning factors such as lands protected by federal and state programs have already been accounted for prior to the local input submitted to SCAG since such factors are required to be considered at the local level. No evidence was submitted that these areas have changed since the most current input provided in May 2019.

While the County asserts that most of the unincorporated County is rural in nature, undeveloped agricultural land or open space, with much of the land in federal (including tribal) or state jurisdictions, no evidence has been provided that the jurisdiction cannot accommodate its RHNA allocation in other areas where residential development is most suitable. The presence of protected open space alone does not reduce housing need nor does it preclude a jurisdiction from accommodating its housing need elsewhere.

For the reasons, SCAG staff does not recommend a reduction to the jurisdiction’s RHNA allocation based on these factors.

***Issue 5: High Housing Cost Burdens [Government Code 65584.04(e)(6)].***

*The County states in its appeal that projects incur significant costs to connect to sewer and/or water service miles away, or to expand inadequate roads. These costs make it extremely challenging to provide non-market rate housing in a fiscally achievable way.*

**SCAG staff response:** Costs to upgrade and develop appropriate infrastructure cannot be considered by SCAG as a justification for a reduction since the purpose of a RHNA allocation is to ensure that there is enough zoning to accommodate a jurisdiction’s housing need. The high housing cost burden factor in Section 65584.04(e)(6) is described as: “[t]he 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,” which refers to the proportion of renter households who are considered cost-burdened for housing. It does not refer to

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the cost of development. For this reason, SCAG staff does not recommend a reduction to the County's draft RHNA allocation based on this factor.

***Issue 6: The region's greenhouse gas emissions targets [Government Code Section 65584.04(e)(12)].***

*The County indicates that it has recently updated its Climate Action Plan, but that it will already be challenged to meet 2030 and 2045 greenhouse gas (GHG) emission reduction targets. Adding to this challenge is having to absorb additional vehicle miles traveled to accommodate housing, which they state will likely be further from existing and planned job centers due to its large RHNA allocation.*

***SCAG staff response:*** SCAG staff recognizes the importance of a local Climate Action Plan, which can help a jurisdiction outline its sustainable goals and strategies to achieve them. However, the purpose of Climate Action Plans are to align with regional greenhouse gas emission targets, which cannot be achieved solely within jurisdictional boundaries.

Additionally, Government Code Section 65584.04(g)(1) prohibits "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" from being used as a justification for a determination or reduction in RHNA allocation. A Climate Action Plan is an important local policy instrument, but it cannot be used to reduce a RHNA allocation. For this reason, SCAG staff does not recommend a reduction to the County's draft RHNA allocation based on this factor.

***Issue 7: Changed Circumstances [Government Code 65584.05(b)].***

*While the County has indicated in its appeal form that it is appealing its draft RHNA allocation based on this reason, there are no statements or evidence to assert or support this factor.*

***SCAG Staff Response:*** SCAG staff does not find any evidence that a change in circumstance has occurred in the County to support its request for a reduction based on this factor. No reduction is recommended based on change in circumstance.

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Other

The County indicates in its letter that it undertook a major planning effort to update its Housing Element in order to meet its 5<sup>th</sup> cycle RHNA allocation of 30,303 units, which also included the rezoning of a large number of parcels and lands to higher densities. Its appeal also states that “to date, no developments have been approved or applied for that took advantage of the previous effort.” SCAG staff acknowledges the difficult task that the County has accomplished to meet its prior housing needs. SCAG also encourages the County to consider using these already zoned areas that are still presumably available to meet up to 75 percent of its 6<sup>th</sup> cycle 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 Methodology (County of Riverside)
2. County of Riverside Appeal Request Form and Supporting Documentation
3. Comments received during the comment period

Southern California Association of Governments  
Remote Participation Only  
**County of Riverside RHNA Appeal**  
**January 6, 2021**

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

This attachment sets forth the nature and timing of the opportunities which the County of Riverside 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 County of Riverside'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 County of Riverside the anticipated number of households in 2020 was 123,829 and in 2030 was 169,922 (growth of 46,093 households). In January 2018, SCAG staff met with local jurisdiction staff to discuss

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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>



the Bottom-Up Local Input and Envisioning Process and answer questions. Input was received from the County of Riverside on the growth forecast in April 2019. Growth from Tribal Lands were excluded from the County of Riverside's household data used in the adopted RHNA methodology. Household totals were 121,523 in 2020 and 166,633 in 2030, for a reduced household growth during this period of 45,110.

**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 County of Riverside 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 County of Riverside 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 County of Riverside

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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).

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 County of Riverside received its draft RHNA allocation on September 11, 2020. Application of the RHNA methodology yields the draft RHNA allocation for the County of Riverside as summarized in the data and calculations in the tables below.

<b>Unincorporated Riverside Co. statistics:</b>	
Forecasted household (HH) growth, RHNA period:	37216
Percent of households who are renting:	27%
Housing unit loss from demolition (2009-18):	126
Adj. forecasted household growth, 2020-2045:*	57,680
Pct. of regional jobs accessible in 30 mins (2045):**	2.15%
Share of region's job accessibility (pop-weighted):	0.41%
Share of region's HQT population (2045)	0.19%
Share of pop. in low/very low-resource tracts:	26.88%
Share of pop. In very high-resource tracts:	40.42%
Social equity adjustment:	150%

<b>RHNA Allocation inputs for Unincorporated Riverside Co.</b>	
Forecasted household (HH) growth, RHNA period:	37216
Vacancy Adjustment	908
Replacement Need	126
<b>TOTAL PROJECTED NEED:</b>	<b>38250</b>
Existing need due to job accessibility (50%)	1735
Existing need due to HQTAs pop. share (50%)	783
Net residual factor for existing need <sup>^</sup>	0
<b>TOTAL EXISTING NEED</b>	<b>2518</b>
<b>TOTAL RHNA FOR UNINCORPORATED RIVERSIDE CO.</b>	<b>40768</b>
Very-low income (<50% of AMI)	10399
Low income (50-80% of AMI)	6648
Moderate income (80-120% of AMI)	7371
Above moderate income (>120% of AMI)	16350

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 19,147 living within HQTAs, the County of Riverside represents 3.64% 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 County of Riverside’s median TAZ, it will be possible to reach 2.15% of the region’s jobs in 2045 within a 30-minute automobile commute (11,301 jobs, based on Connect SoCal’s 2045 regional job forecast of 10,049,000 jobs).

Please note that the above represents only a partial description of key data and calculations which result in the draft RHNA allocation.



# COUNTY OF RIVERSIDE

## Transportation and Land Management Agency



Transportation

Planning

Building & Safety

Code Enforcement

Aviation

Salton Sea

October 26, 2020

RHNA Subcommittee  
Southern California Association  
of Governments (SCAG)  
900 Wilshire Blvd, Ste. 1700  
Los Angeles, CA 90017  
Submitted via: [Housing@scag.ca.gov](mailto:Housing@scag.ca.gov)

### RE: APPEAL OF THE 6<sup>TH</sup> CYCLE REGIONAL HOUSING NEEDS ASSESSMENT ("RHNA") ALLOCATION

Dear RHNA Subcommittee:

Please accept this appeal of the Riverside County 6<sup>th</sup> Cycle Regional Housing Needs Assessment ("RHNA") allocation based on improper application of the methodology, local planning factors, and a change in circumstances, as described in the enclosed appeal packet and *Appeal Request Form*.

In short, a total housing unit allocation of 40,768 to Riverside County is inappropriate and unrealistic, based on the supporting information provided with this appeal, especially the construction of these units within the eight (8) year planning period for the upcoming 6<sup>th</sup> Cycle Housing Element. The County of Riverside requests correction of the allocation and reallocation of the County's assigned units.

If you have any further questions or need more information, please contact me Robert Flores, Principal Planner by email at [RFlores@rivco.org](mailto:RFlores@rivco.org) or by phone at (951) 955-1195.

Sincerely,

Charissa Leach, P.E.  
Interim Director of Transportation and Land Management Agency  
County of Riverside

#### Enclosures

- CC: Board of Supervisors
- Mr. Kome Ajise, SCAG Executive Director
- George Johnson, CEO
- Juan C. Perez, Interim CEO
- Lisa Brandl, COO

## **APPEAL OF THE 6<sup>TH</sup> CYCLE REGIONAL HOUSING NEEDS ASSESSMENT (“RHNA”) ALLOCATION**

The County of Riverside (“Riverside County” or “County”) is one of two Counties that make up the Inland Empire and is bounded by the County of San Bernardino to the north, the State of Arizona to the east, the Counties of San Diego and Imperial to the south, and the County of Orange to the west, as shown on Figure 1.

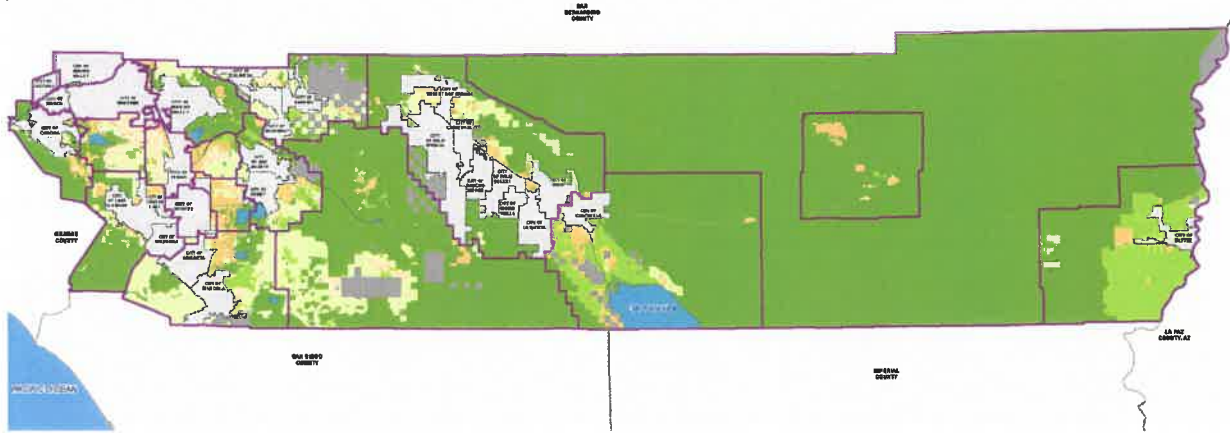


Figure 1 Riverside County Land Use Map

The County’s area currently encompasses 7,200 square miles and includes 28 incorporated cities, including the last four cities that were incorporated in the state of California. The County has a population of 2.47 million people – with only approximately 394,200 people (16%) residing within the unincorporated areas of the County. Most of the unincorporated County is rural in nature, undeveloped agricultural land or open space, with much of the land in federal (including tribal) or state jurisdiction and the remaining land in constrained situations, such as preservation, conservation or sensitive situations (habitat or biological, etc.). Most urban areas in Riverside County are located within incorporated cities.

### **Background**

As indicated in the prior attached comment letters, significant concerns with the 5th cycle RHNA allocations, are now carried into the 6th cycle. As a result of the 5th Cycle of RHNA, the unincorporated areas of Riverside County were allocated 30,303 dwelling units, for an unincorporated population of approximately 296,000. This total unit allocation was larger than any other jurisdiction received within the SCAG region (except the City of Los Angeles, which had 82,002 allocated units with a population of over 4 million). In comparison, Los Angeles County (unincorporated) was allocated 30,145 total dwelling units (with an unincorporated population of 1,052,000), while San Bernardino County was allocated 39 units (with an unincorporated population of 311,000 - similar to Riverside County).

In 2015, the County undertook a major planning effort to update our Housing Element in order to meet our 5<sup>th</sup> Cycle RHNA allocations. This resulted in rezoning about 1,000 parcels and thousands of acres of land to highest-density residential (20-40 dwelling units per acre), including mixed use areas, to meet our housing targets. This was a most difficult undertaking and further points out the challenges that the County will face in finding suitable land. In fact, to date, no developments have been approved or applied for that took advantage of the previous effort.

The County has participated in the RHNA process from the beginning by attending meetings and hearings and providing comments at most milestones of the process, which includes the submittal of five (5) formal comment letters sent to SCAG’s Regional Council and RHNA Subcommittee that are attached hereto and incorporated herein by reference. In addition, the Interim County CEO, Juan C. Perez spoke at one of the RHNA public hearings and explained our opposition to a large allocation of 40,768 housing units for the reasons discussed below.

For the 6<sup>th</sup> Cycle RHNA, Riverside County is expected to generate a vast amount of dwelling units relative to its population. In fact, the unincorporated County is expected to generate nearly twenty-five percent (25%), or 40,768 units, of the County-wide unit allocations (cities included), which totals 167,177 housing units. The allocation of 40,768 units to the unincorporated area of the County is out of proportion to our ability to provide for urban-scale development.

### **Appeal Request**

**Riverside County is filing its appeal based on the criteria listed below, which is consistent to SCAG’s guidelines and pursuant to state law (Government Code 65584.).**

*Comparable Jurisdiction:* As previously mentioned, San Bernardino is similar to Riverside County in population, but it is also similar in nature, development, land availability, growth, infrastructure, etc. However, San Bernardino County has almost 80% less units (approximately 8,813 housing units) than the 40,768 housing units allocated to the unincorporated Riverside County area. That means that a similar jurisdiction has over 30,000 less units than Riverside County. SCAG failed to apply the methodology consistently and must address this inconsistency.

*March Joint Powers Authority:* Previous versions of the Draft RHNA documents and calculator combined the County with March Joint Powers Authority (JPA). March JPA has its own land use authority within its boundary separated from the County’s land use jurisdiction, as shown in their General Plan, found online at: [https://www.marchjpa.com/documents/docs\\_forms/general\\_plan\\_updt\\_011718.pdf](https://www.marchjpa.com/documents/docs_forms/general_plan_updt_011718.pdf) (incorporated herein by reference). If the County was allocated any units belonging to March JPA, the Final RHNA methodology was applied inappropriately, and SCAG failed to determine the County’s share of RHNA allocation correctly.

*Infrastructure & Utilities:* The unincorporated areas of Riverside County lack the basic infrastructure and utilities, such as sewer and water systems, a developed roadway network, sidewalks, flood control facilities, dry utilities and frequent transit service, to support urban-type high-density housing that is needed to support a large allocation of units.

By its very nature, the unincorporated areas of Riverside County do not enjoy “city core” of urban centers, and thus does not possess urban-level infrastructure. Riverside County is home to the last four cities that were incorporated in California (Jurupa Valley in 2011, Eastvale in 2010, and Menifee and Wildomar in 2008). These cities are located along major transportation corridors such as I-15, SR-60, and constitute much of what previously the denser, semi-urbanized portions of the unincorporated areas of the County. The unincorporated areas of the County that remain are mostly rural in nature.

There are no commuter rail stations located in the unincorporated areas of Riverside County, and no commuter rail stations anywhere, whatsoever, in the Coachella Valley, whether in incorporated cities or the unincorporated areas. There are few dense employment centers within the unincorporated areas of



Riverside County. Any development that occurs within Riverside County has to “pay its own way” for infrastructure. Often, projects incur significant costs to connect to sewer and/or water service miles away, or expand inadequate roads, making it extremely challenging to provide non-market rate housing in a fiscally achievable way. In addition, the County only has control of transportation and flood infrastructure, and all other infrastructure, utilities and services are provided or controlled by dozens of special districts, purveyors, or agencies.

As such, mandating higher density urban-level development by allocating **40,768** housing units in areas that lack the basic infrastructure to support it will cause additional strain on the already over-burdened existing infrastructure, and on our existing unincorporated facilities. The County has relayed this basic factor to SCAG through countless opportunities, and the RHNA allocation still does not appear to incorporate such planning factors. Therefore, SCAG failed to consider information provided within comments or during prior allocations.

Greenhouse Gas (“GHG”)/Climate Action Plan: Further, Riverside County recently updated its Climate Action Plan, which can be accessed at:

[https://planning.rctlma.org/Portals/14/CAP/2019/2019 CAP Update Full.pdf](https://planning.rctlma.org/Portals/14/CAP/2019/2019%20CAP%20Update%20Full.pdf) and is incorporated herein by reference. The County will be challenged to meet 2030 and 2045 GHG reduction targets even without having to absorb additional vehicles miles travelled to accommodate housing, which for the foreseeable future will likely be further from existing and planned job centers because of the sheer size of the RHNA allocation for Riverside County.

**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: County of Riverside  
*(to file another appeal, please use another form)*

Filing Party (Jurisdiction or HCD)  
County of Riverside

Filing Party Contact Name  
Robert Flores

Filing Party Email:  
RFlores@rivco.org

**APPEAL AUTHORIZED BY:**

Name: Charissa Leach, Interim TLMA Director

**PLEASE SELECT BELOW:**

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

**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@scag.ca.gov](mailto:housing@scag.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.

Please see "Appeal of the 6th Cycle Regional Housing Needs Assessment ("RHNA") Allocation" included in this appeal packet.

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

Please see "Appeal of the 6th Cycle Regional Housing Needs Assessment ("RHNA") Allocation" included in this appeal packet.

**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. Riverside County General Plan
2. Riverside County Climate Action Plan
3. March JPA General Plan

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_

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

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



**COUNTY OF RIVERSIDE**  
**Transportation and Land Management Agency**  
 Juan C. Perez  
 Assistant CEO/TLMA Director



Transportation Department

Planning Department

Building and Safety Department

Code Enforcement Department

October 16, 2019

The Honorable Peggy Huang, Chair  
 Community Economic &  
 Human Development Committee (CEHD)  
 Southern California Association of Governments  
 900 Wilshire Blvd, Ste. 1700  
 Los Angeles, CA 90017

RE: 6<sup>th</sup> Cycle of the Regional Housing Needs Assessment (RHNA) Allocation.

Dear Ms. Huang,

The comments letter are provided on behalf of Riverside County's Transportation and Land Management Agency (TLMA) regarding the RHNA allocation process and allocation option to be presented for consideration to the Community Economic & Human Development (CEHD) Committee.

TLMA has reviewed the Modified Option 1 presented by SCAG staff on October 7<sup>th</sup> of the RHNA subcommittee. Our concerns with this option mirror those concerns we identified for original Options 1 and 3, as stated in TLMA's letter of August 27, 2019 to SCAG President Bill Jahn. This letter points out major concerns that Riverside County Staff has with the methodology that SCAG has used to arrive at an inequitable RHNA allocation in the 5<sup>th</sup> cycle, which we request be addressed individually for Riverside County as part of the 6<sup>th</sup> cycle process.

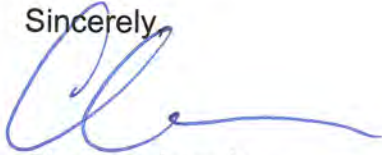
We are providing additional comments below on Modified Option 1 which should be presented to the aforementioned SCAG recommending and decision-making bodies.

- The focus on the RHNA allocation should be on the 6<sup>th</sup> Cycle timeframe of 2021-2029 and the housing needs for that period. No consideration should be given to 2045 projections that are so far out into the future, as demographics can change significantly between the end of the decade and 2045, and the County's General Plan buildout projection, as well as that of our neighboring jurisdictions, does not extend out to 2045. Before 2045 projections are used, they should be vetted with local jurisdictions and reconciled with their projections.

- The existing need, if calculated separate than the projected need, should be calculated using existing conditions because projected growth and planned facilities have little to no bearing on current housing need. Therefore, similar to the original Option 1, share of “existing” population and share of “existing” population within HQTAs should be used, with the addition of an “existing” job accessibility component. (Proposed existing need: existing pop. [50%] + existing pop./HQTAs [25%] + existing job accessibility [25%]).
- SCAG is to be commended for addressing access to jobs and transit in response to the comments received in formulating Modified Option 1. However, such consideration should extend beyond “existing need” and also include “projected need”. In order to create a balance of land uses, access to jobs and transit is a critical consideration for the present, and will continue to be in the future. (Proposed projected need: projected HH growth for 2029 [50%] + pop. w/in planned HQTAs up to 2029 [25%] + future job accessibility areas up to 2029 [25%]).
- A further reason for addressing access to jobs and transit for the 6th Cycle is because Riverside County is in the midst of updating its Climate Action Plan. The County will be challenged to meet 2030 and 2045 greenhouse gas reduction targets even without having to absorb additional vehicles miles travelled to accommodate housing, which for the foreseeable future will likely be further from existing and planned job centers because of the sheer size of the numbers expected from the RHNA allocation.
- As stated in TLMA's August 29th letter, we continue to support original Option 2 as the most equitable means to fairly provide housing allocation. In addition to considering transit access, it does not create, what appears to be, an artificial distinction between existing and projected need – a need is a need. It also does not include variables such as permit activity, vacancy rates and replacement need which can be addressed differently by the jurisdictions, making these variables potentially inconsistent between the jurisdictions. Modified Option 1 does not address this inconsistency issue, except for the removal of the permit activity variable.
- Because of state law changes, the preparation of annual progress reports which monitor a jurisdiction's efforts toward meeting housing targets have become increasingly complex and labor intensive regarding data collection. Modified Option 1 will continue this trend and make it extremely difficult to maintain priorities, including the preparation of annual progress reports in the face of budget limitations and competing priorities. Therefore, a more standardized Modified Option 1 should be considered, if not a re-opener of original Option 2.

Thank you for the opportunity to provide these comments. We remain willing to engage with SCAG staff more closely, as we have offered in the past, to discuss our concerns in more detail.

Sincerely,



Charissa Leach  
Assistant Director Transportation and Land Management Agency

Cc: Riverside County Board of Supervisors  
Hon. Bill Jahn, SCAG President  
Hon. Rusty Bailey, Riverside, RHNA Subcommittee Representative  
Hon. Russell Betts, Desert Hot Springs, RHNA Subcommittee Alternate  
Mr. Kome Ajise, SCAG Executive Director  
Ms. Ma'Ayn Johnson, SCAG Housing and Land Use Planner  
George Johnson, CEO  
Lisa Brandl, COO



# COUNTY OF RIVERSIDE

## Board of Supervisors

District 1	<b>Kevin Jeffries</b> 951-955-1010
District 2	<b>Karen Spiegel</b> 951-955-1020
District 3	<b>Chuck Washington</b> 951-955-1030
District 4	<b>V. Manuel Perez</b> 951-955-1040
District 5	<b>Jeff Hewitt</b> 951-955-1050

October 23, 2019

Honorable Bill Jahn, President  
Regional Council  
Southern California Association  
of Governments (SCAG)  
900 Wilshire Blvd, Ste. 1700  
Los Angeles, CA 90017

RE: 6th Cycle Regional Housing Needs Assessment (RHNA) Allocation

Dear President Jahn,

This comment letter is provided on behalf of the County of Riverside regarding SCAG's RHNA allocation process to be presented for consideration to the SCAG Regional Council on November 7, 2019.

County staff has reviewed the draft methodology recommended by the RHNA subcommittee on October 7th and the Community, Economics, and Human Development (CEHD) committee on October 21st. Our concerns with this option mirror those concerns we identified for original Options 1 and 3, as stated in the attached TLMA's letters dated July 18th, August 27th, October 3rd, and October 16th. These letters point out major concerns that the County has with the draft methodology, which is inequitable, and that identifies a target housing number for Riverside County of over 46,000 units for the next cycle.

We also want to go on record to reiterate the past comments made by County staff, as indicated in the prior attached comment letters, regarding significant concerns with the 5<sup>th</sup> cycle RHNA allocations, which are now being carried into the 6<sup>th</sup> cycle. As a result of the 5<sup>th</sup> Cycle of RHNA, the unincorporated areas of Riverside County were allocated 30,303 dwelling units, for an unincorporated population of approximately 385,000. This total unit allocation was larger than any other jurisdiction received within the SCAG region (except the City of Los Angeles, which had 82,002 allocated units with a population of over 4 million). In comparison, Los Angeles County (unincorporated) was allocated 30,145 total dwelling units (with an unincorporated population of 1,052,000), while San Bernardino County was allocated 39 units (with an unincorporated population of 311,000 - similar to Riverside County).

We are providing comments below on draft methodology that should be presented to the Regional Council ahead of the November 7th public hearing:

- As stated in previous letters, we continue to support original Option 2 as the most equitable means to fairly provide housing allocation. In addition to considering transit access, this option does not create what appears to be an artificial distinction between existing and projected need – a need is a need. It also does not include variables such as vacancy rates and replacement need, which can be addressed differently by the jurisdictions. The draft methodology does not adequately address these inconsistency issues.

# COUNTY OF RIVERSIDE



## Board of Supervisors

District 1	<b>Kevin Jeffries</b> 951-955-1010
District 2	<b>Karen Spiegel</b> 951-955-1020
District 3	<b>Chuck Washington</b> 951-955-1030
District 4	<b>V. Manuel Perez</b> 951-955-1040
District 5	<b>Jeff Hewitt</b> 951-955-1050

- The focus on the RHNA allocation should be on the 6th Cycle timeframe of 2021-2029 and the housing needs for that period. No consideration should be given to 2045 projections that are so far out into the future, as demographics can change significantly between the end of the decade and 2045, and the County's General Plan buildout projection, as well as that of our neighboring jurisdictions, does not extend out to 2045.
- Greater consideration needs to be given to jobs and transit than is being proposed in the draft methodology to address job/housing imbalance and promote housing development near transit. The County continues to support the substitute motion presented at the RHNA Subcommittee, which is to consider jobs access and transit access for existing need, additionally even for projected need.
- The unincorporated areas of Riverside County lack the basic infrastructure to support urban-type high-density housing. There is a tremendous need to align infrastructure funding opportunities from State and Regional sources to SCAG-adopted housing targets, as mentioned in the October 21st CEHD committee meeting. Consideration has to be given to help prioritize funding for those jurisdictions that lack back-bone infrastructure yet are expected to provide for a significant share of the regional housing needs.
- The existing need, if calculated separately than the projected need, should be calculated using existing conditions because projected growth and planned facilities have little to no bearing on current housing need.

Thank you for the opportunity to provide these comments. We remain willing to engage with SCAG staff more closely, as we have offered in the past, to discuss our concerns in more detail, specifically as it relates to Riverside County's allocation.

Respectfully,

Kevin Jeffries, Chairman  
Riverside County Board of Supervisors

Enclosures

Cc: Riverside County Board of Supervisors  
Hon. Rusty Bailey, Riverside, RHNA Subcommittee Representative  
Hon. Russell Betts, Desert Hot Springs, CEHD Committee Representative  
Mr. Kome Ajise, SCAG Executive Director  
Ms. Ma'Ayn Johnson, SCAG Housing and Land Use Planner  
George Johnson, CEO  
Lisa Brandl, COO  
Juan C. Perez, Assistant CEO & Director of TLMA  
Charissa Leach, Assistant Director of TLMA





COUNTY OF RIVERSIDE  
Transportation and Land Management Agency  
Juan C. Perez  
Assistant CEO/TLMA Director



Transportation Department

Planning Department

Building and Safety Department

Code Enforcement Department

October 3, 2019

Honorable Peggy Huang, Chair  
RHNA Subcommittee of the  
Southern California  
Association of Governments  
900 Wilshire Blvd, Ste. 1700  
Los Angeles, CA 90017

RE: 6<sup>th</sup> Cycle of the Regional Housing Needs Assessment (RHNA) Allocation.

Dear Ms. Peggy Huang,

Thank you for the opportunity to provide additional comments on behalf of Riverside County's Transportation and Land Management Agency (TLMA) regarding the RHNA allocation process and allocation option to be presented for consideration to the RHNA Subcommittee, CEHD Committee and the Regional Council.

TLMA has reviewed the Modified Option 1 presented by SCAG staff at the September 23, 2019 workshop. Our concerns with this option mirror those concerns we identified for original Options 1 and 3, as stated in TLMA's letter of August 27, 2019 to SCAG President Bill Jahn. These letters point out major concerns that Riverside County Staff has with the methodology that SCAG has used to arrive at an unequitable RHNA allocation in the 5th cycle, which we request be addressed individually for Riverside County as part of the 6th cycle process.

We are providing additional comments below on Modified Option 1 which should be presented to the aforementioned SCAG recommending and decision-making bodies.

- The focus on the RHNA allocation should be on the 6th Cycle timeframe of 2021-2029 and the housing needs for that period. No consideration should be given to

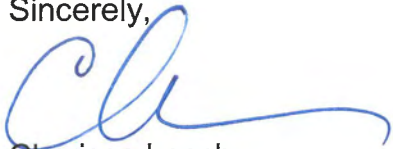
2045 projections that are so far out into the future, as demographics can change significantly between the end of the decade and 2045, and the County's General Plan buildout projection, as well as that of our neighboring jurisdictions, does not extend out to 2045. Before 2045 projections are used, they should be vetted with local jurisdictions and reconciled with their projections.

- The existing need, if calculated separate than the projected need, should be calculated using existing conditions because projected growth and planned facilities have little to no bearing on current housing need. Therefore, similar to the original Option 1, share of "existing" population and share of "existing" population within HQTAs should be used, with the addition of an "existing" job accessibility component. (Proposed existing need: existing pop. [50%] + existing pop./HQTAs [25%] + existing job accessibility [25%]).
- SCAG Staff is to be commended for addressing access to jobs and transit in response to the comments received in formulating Modified Option 1. However, such consideration should extend beyond "existing need" and also include "projected need". In order to create a balance of land uses, access to jobs and transit is a critical consideration for the present, and will continue to be in the future. (Proposed projected need: projected HH growth for 2029 [50%] + pop. w/in planned HQTAs up to 2029 [25%] + future job accessibility areas up to 2029 [25%]).
- A further reason for addressing access to jobs and transit for the entire 6th Cycle Riverside County is in the midst of updating its Climate Action Plan. It will be challenged to meet 2030 and 2045 greenhouse gas reduction targets even without having to absorb additional vehicles miles travelled to accommodate housing which for the foreseeable future will likely be further from existing and planned job centers because of the sheer size of the numbers expected from the RHNA allocation.

- As stated in TLMA’s August 29th letter, we continue to support original Option 2 as the most equitable means to fairly provide housing allocations. In addition to considering transit access, it does not create, what appears to be, an artificial distinction between existing and projected need – a need is a need. It also does not include variables such as permit activity, vacancy rates and replacement need which can be addressed differently by the jurisdictions, making these variables potentially inconsistent between the jurisdictions. Modified Option 1 does not address this inconsistency issue, except for the removal of the permit activity variable.
- Because of state law changes, the preparation of annual progress reports which monitor a jurisdiction’s efforts toward meeting housing targets have become increasingly complex and labor intensive regarding data collection. Modified Option 1 will continue this trend and make it extremely difficult to maintain priorities, including the preparation of annual progress reports in the face of budget limitations and competing priorities. Therefore, a more standardized Modified Option 1 should be considered, if not a re-opener of original Option 2.

Thanks again for the opportunity to provide these additional comments. We remain willing to engage with SCAG staff more closely, as we have offered in the past, to discuss our concerns in more detail.

Sincerely,



Charissa Leach  
Assistant Director Transportation and Land Management Agency

- Cc: Riverside County Board of Supervisors  
Hon. Bill Jahn, SCAG Regional Council President  
Hon. Rusty Bailey, Riverside, RHNA Subcommittee Representative  
Hon. Russell Betts, Desert Hot Springs, RHNA Subcommittee Alternate  
Mr. Kome Ajise, SCAG Executive Director  
Ms. Ma’Ayn Johnson, SCAG Housing and Land Use Planner  
George Johnson, CEO  
Lisa Brandl, COO



**COUNTY OF RIVERSIDE**  
**Transportation and Land Management Agency**  
Juan C. Perez  
Assistant CEO/TLMA Director



Transportation Department

Planning Department

Building and Safety Department

Code Enforcement Department

July 18, 2019

RHNA Subcommittee of the  
Southern California  
Association of Governments  
900 Wilshire Blvd, Ste. 1700  
Los Angeles, CA 90017  
C/o Bill Jahn, President

RE: 6<sup>th</sup> Cycle of the Regional Housing Needs Assessment (RHNA) Allocation.

Dear Mr. Jahn,

Thank you for the opportunity to submit this comment letter on behalf of Riverside County's Transportation and Land Management Agency. Our Agency serves as the Planning entity for Riverside County's unincorporated communities. This letter is intended to highlight and expand on my testimony to the RHNA Subcommittee on June 3, 2019, highlighting concerns with the methodology used in the past by SCAG for the RHNA allocations. We are asking that our concerns be addressed as part of the upcoming 6<sup>th</sup> Cycle RHNA allocation process.

As a result of the 5<sup>th</sup> Cycle of RHNA, the unincorporated areas of Riverside County were allocated 30,303 dwelling units, while having a population in the unincorporated area of approximately 385,000. Of these 30,303 units, 17,578 (58%) are designated as non-market rate housing (moderate, low, and very low income). This total unit count is larger than any other jurisdiction within the entirety of the SCAG region (with the exception of the City of Los Angeles, which has 82,002 total units allocated over a population of over 4 million). As a comparison, Los Angeles County (unincorporated) was allocated 30,145 total dwelling units (with an unincorporated population of 1,062,000), while San Bernardino County was allocated 39 units (with an unincorporated population of about 311,000 – similar to Riverside County).

Riverside County is concerned about the RHNA Allocation process producing statistical outliers that cannot be easily rectified. Not only is the unincorporated area of Riverside County being expected to generate a vast amount of dwelling units relative to its population, but a number of cities within our County are facing the same dilemma, such as Desert Hot Springs, with an allocation of 4,196 units for a population of 28,815. We also note that, proportionally, the unincorporated areas of the County constitute about 16% of the total County's population of 2.45 million, but nearly double (30%) of the County-wide unit allocation of 101,374. This allocation in units to the unincorporated area is out of proportion to our ability to provide for urban-scale development.

4080 Lemon Street, 14th Floor • Riverside, California 92501 • (951) 955-6838  
P. O. Box 1605 • Riverside, California 92502-1605 • FAX (951) 955-5177

By its very nature, the unincorporated areas of Riverside County have no “city core” of urban centers, and thus does not have urban-level infrastructure. Riverside County is home to the last four Cities incorporated in California (Jurupa Valley in 2011, Eastvale in 2010, and Menifee and Wildomar in 2008). These cities are located along major transportation corridors such as I-15, SR-60, and I-215, and constitute much of what previously used to be the denser, semi-urbanized portions of the unincorporated area.

There are no commuter rail stations anywhere in the unincorporated areas of Riverside County, and no commuter rail stations anywhere whatsoever in the Coachella Valley, whether in incorporated cities or the unincorporated area. There are few dense employment centers within the unincorporated areas of Riverside County. Any development that occurs within Riverside County has to “pay its own way” for infrastructure improvements, and many of our unincorporated communities lack urban-level infrastructure such as sewer systems, a developed roadway network, sidewalks, and frequent transit service. Often, projects incur significant costs to connect to sewer service miles away, or expand inadequate roads, making it extremely challenging to provide non-market rate housing in a fiscally achievable way. As such, mandating higher density urban-level development in areas that lack the basic infrastructure to support it will cause additional strain on the already over-burdened existing infrastructure, and on our existing unincorporated communities.

In 2015, the County undertook a major planning effort to update our Housing Element in order to meet our 5<sup>th</sup> Cycle RHNA allocations. This resulted in re-zoning about 1,000 parcels to highest-density residential (20-40 dwelling units per acre), including mixed-use areas, to meet our housing targets. This was a most difficult undertaking and further points out the challenges that the County will face in finding suitable land, if we receive a further significant RHNA allocation as part of the 6<sup>th</sup> Cycle.

We are therefore requesting that SCAG consider the following as part of the 6<sup>th</sup> Cycle allocation process:

- A proportionality analysis be conducted that takes into account a jurisdiction’s ability to accommodate additional housing growth based on its current population.
- An infrastructure component be included to take into account those communities that lack the back-bone infrastructure to provide in-fill, urban-scale development.
- We support the concept of phasing housing allocations beyond a single RHNA cycle. This will provide for a more achievable phase-in for housing growth beyond the 8-year cycle frequency.
- A truly consultative process be established to allow jurisdictions to engage SCAG staff in meaningful discussions as draft housing targets are developed, so that local and sub-regional concerns can be better captured in the final allocations.

- An analysis be conducted to assess how infrastructure funding opportunities that SCAG participates in (through grants etc.), or can advocate for at the State-level, can be better aligned with SCAG-adopted housing targets. Consideration should be given to help prioritize funding for those jurisdictions that lack back-bone infrastructure yet are expected to provide for a significant share of the regional housing needs.

We appreciate the opportunity to provide these comments, and would very much appreciate the opportunity to have a more in-depth discussion with SCAG staff as this process moves forward.

Sincerely,



**Assistant TLMA Director  
Community Development**

Juan C. Perez, Assistant CEO &  
Director of Transportation and Land Management Agency

Cc: Board of Supervisors  
Hon. Rusty Bailey, Riverside, RHNA Subcommittee Representative  
Hon. Russell Betts, Desert Hot Springs, RHNA Subcommittee Alternate  
Mr. Kome Ajise, SCAG Executive Director  
George Johnson, CEO  
Lisa Brandl, COO



COUNTY OF RIVERSIDE  
Transportation and Land Management Agency



Juan C. Perez  
Assistant CEO/TLMA Director

Transportation Department

Planning Department

Building and Safety Department

Code Enforcement Department

August 27, 2019

RHNA Subcommittee of the  
Southern California  
Association of Governments  
c/o Bill Jahn, President  
900 Wilshire Blvd, Ste. 1700  
Los Angeles, CA 90017

RE: 6<sup>th</sup> Cycle of the Regional Housing Needs Assessment (RHNA) Allocation.

Dear Mr. Jahn,

Thank you for the opportunity to submit this comment letter on behalf of Riverside County's Transportation and Land Management Agency. Our Agency serves as the Planning entity for Riverside County's unincorporated communities. The County of Riverside has very significant concerns with the methodology options being considered by SCAG for the upcoming RHNA allocation processes. Those concerns are even further heightened by the most recent release by the State Housing and Community Development (HCD) of significantly expanded housing targets for Southern California. We are asking that our concerns be addressed as part of the upcoming 6th Cycle RHNA allocation process.

As a result of the 5<sup>th</sup> Cycle of RHNA, the unincorporated areas of Riverside County were allocated 30,303 dwelling units, for an unincorporated population of approximately 385,000. Of these 30,303, 17,578 (58%) were designated as non-market rate housing (moderate, low, and very low income). This total unit allocation was larger than any other jurisdiction within the SCAG region (except the City of Los Angeles, which had 82,002 allocated units with a population of over 4 million). In comparison, Los Angeles County (unincorporated) was allocated 30,145 total dwelling units (with an unincorporated population of 1,052,000), while San Bernardino County was allocated 39 units (with an unincorporated population of 311,000 – similar to Riverside County).

We have reviewed the recent SCAG release of methodology options to be considered for the 6th cycle. **Of the three options presented, it is our opinion that Option 2, which more closely takes into account each jurisdiction's share of the overall SCAG population (80% weight), combined with a consideration on High Quality Transit Areas (20% weight), most accurately allocates units in an equitable and feasible way.**

**That being said, we note that even with this Option 2, Riverside County would be allocated an additional 10,861 units (both market date and affordable) using the SCAG estimator. Using the overall target numbers released by HCD on August 22, 2019, that number increases to 21,493 (or which 12,089 are moderate, low or very low income).**

By its very nature, the unincorporated areas of Riverside County have no "city core" of urban centers, and thus does not have urban-level infrastructure. Riverside County is home to the last four Cities incorporated in California (Jurupa Valley in 2011, Eastvale in 2010, and Menifee and Wildomar in 2008). These cities are located along major transportation corridors such as I-15, SR-60, and I-215, and constitute much of what previously used to be the denser, semi-urbanized portions of the unincorporated area.

There are no commuter rail stations anywhere in the unincorporated areas of Riverside County, on in the Coachella Valley. There are few dense employment centers within the unincorporated areas. Any development that occurs within our jurisdiction has to "pay its own way" for infrastructure improvements, and many of our unincorporated communities lack urban-level infrastructure such as sewer systems, a developed roadway network, sidewalks, and frequent transit service. Often, housing projects incur significant costs to connect to sewer service miles away, or expand inadequate roads, making it extremely challenging to provide non-market rate housing in a fiscally achievable way. Mandating higher density urban-level development in areas lacking basic infrastructure will cause additional strain on our over-burdened existing infrastructure, and on our communities.

**We note that the RHNA 5<sup>th</sup> Cycle was based on the 2010 census data, with a population estimate of 502,392 used for Riverside County. In fact, given the above-mentioned incorporations, our County unincorporated 5<sup>th</sup> Cycle population was approximately 385,000. The current SCAG estimate for the unincorporated area is 394,200.**

**In order to more equitably distribute target numbers for the 6<sup>th</sup> Cycle, the population number that was incorrectly used for the 5<sup>th</sup> Cycle needs to be taken into consideration, rather than simply adding more units to the County through the 6<sup>th</sup> Cycle. This would also be consistent with the concept of phasing housing allocations beyond a single RHNA cycle, which the County supports.**

In 2015, the County undertook a major planning effort to update our Housing Element in order to meet our 5th Cycle RHNA allocations. This resulted in re-zoning about 1,000 parcels to highest-density residential (20-40 dwelling units per acre), including mixed-use areas, to meet our housing targets. This was a most difficult undertaking, and further points out the challenges that the County will face in finding suitable land if we receive a further significant RHNA allocation as part of the 6th Cycle.

**We further request that an analysis be conducted to assess how infrastructure funding opportunities that SCAG participates in (through grants etc.), or can advocate for at the State-level, can be better aligned with SCAG-adopted housing targets. Consideration should be given to help prioritize funding for those jurisdictions that lack back-bone infrastructure yet are expected to provide for a significant share of the regional housing needs.**



We appreciate the opportunity to provide these comments, and would very much appreciate the opportunity to have a more in-depth discussion with SCAG staff as this process moves forward.

Respectfully,



Juan C. Perez, Assistant CEO &  
Director of Transportation and Land Management Agency

Cc: Board of Supervisors  
Hon. Rusty Bailey, Riverside, RHNA Subcommittee Representative  
Hon. Russell Betts, Desert Hot Springs, RHNA Subcommittee Alternate  
Mr. Kome Ajise, SCAG Executive Director  
George Johnson, CEO  
Lisa Brandl, COO

## Ma'Ayn Johnson

---

**From:** Regional Housing  
**Sent:** Wednesday, November 18, 2020 10:08 AM  
**To:** Flores, Robert; Regional Housing  
**Cc:** Ma'Ayn Johnson; Hersh, Peter  
**Subject:** RE: Riverside County Appeal

Thank you, Robert!

-Meg

---

**From:** Flores, Robert <rflores@RIVCO.ORG>  
**Sent:** Tuesday, November 17, 2020 9:52 AM  
**To:** Regional Housing <Housing@scag.ca.gov>  
**Cc:** Ma'Ayn Johnson <johnson@scag.ca.gov>; Hersh, Peter <phersh@RIVCO.ORG>  
**Subject:** RE: Riverside County Appeal

Hi Meg:

Please see the links to the documents listed in the County's appeal below and the attached letters (which SCAG should have) that were incorporated into the County's appeal by reference.

- Riv. Co. General Plan (all elements/chapters, area plans, and appendicies): <https://planning.rctlma.org/General-Plan-Zoning/General-Plan>
- Riv. Co. CAP: <https://planning.rctlma.org/CAP>
  - CAP document: [https://planning.rctlma.org/Portals/14/CAP/2019/2019\\_CAP\\_Update\\_Full.pdf](https://planning.rctlma.org/Portals/14/CAP/2019/2019_CAP_Update_Full.pdf)
- MIPA General Plan: [https://www.marchjpa.com/documents/docs\\_forms/general\\_plan\\_updt\\_011718.pdf](https://www.marchjpa.com/documents/docs_forms/general_plan_updt_011718.pdf)

Please let me know if you need anything else from the County of Riverside. Thank you.

Kind regards,

Robert Flores  
Principal Planner | Advance Planning  
Riverside County Planning Department | 4080 Lemon Street, 12<sup>th</sup> Floor, Riverside, CA 92501  
Direct (951) 955-1195 | Main (951) 955-3200 | Fax (951) 955-1811

[RFlores@RivCo.org](mailto:RFlores@RivCo.org) | <http://planning.rctlma.org/> | [Follow us on Twitter!](#) 



[How are we doing? \(Click the link and tell us\)](#)

---

**From:** Regional Housing [<mailto:Housing@scag.ca.gov>]  
**Sent:** Friday, November 13, 2020 1:05 PM



COMMUNITY DEVELOPMENT DEPARTMENT  
"Promoting and Sustaining Quality Development"

400 S. Vicentia Avenue, Corona, California 92882  
Phone: (951) 736-2434  
[www.CoronaCA.gov](http://www.CoronaCA.gov)

December 10, 2020

RHNA Appeals Board  
Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, CA 90017  
Sent via [housing@scag.ca.gov](mailto:housing@scag.ca.gov)


**RE: Appeal of the RHNA Allocation – Comment Letter**

Dear RHNA Appeals Board:

The City of Corona submits this comment letter as an objection to receiving any potential reallocation of the draft RHNA allocation issued on March 5, 2020, that would result in the City receiving a higher RHNA allocation due the RHNA appeals filed by the City of Hemet and County of Riverside. It is the City's understanding that successful appeals of the RHNA allocation would be reallocated to the region in which the appeal was granted. Western Riverside County received a total RHNA allocation of 94,869 units, which was allocated among its 15 jurisdictions including unincorporated Riverside County. SCAG's final methodology on the RHNA allocation took into consideration the public comments from the WRCOG region regarding the need for housing closest to job centers and to public transportation. This resulted in increased shares of lower income RHNA to jurisdictions that have higher housing costs in addition to half of the *existing need* portion of the methodology based on the jurisdiction's share of the region's estimated jobs in 2045.

In the appeals filed by the City of Hemet and the County of Riverside, neither agency indicates the number of housing units being appealed. The appeals are basically against the RHNA allocation issued to the jurisdiction for the reasons cited in their letters. The appeals give no indication as to the number of housing units that could be potentially reallocated to the jurisdictions within Western Riverside County if the appeals are granted by SCAG. Therefore, the City of Corona strongly objects to the reallocation of housing units within the WRCOG region that would increase the City's RHNA from the March 5, 2020 draft allocation due to the appeals filed by the City of Hemet and Riverside County.

Sincerely,

  
Joanne Coletta  
Community Development Director  
[Joanne.Coletta@CoronaCA.gov](mailto:Joanne.Coletta@CoronaCA.gov)

CC: City Manager Jacob Ellis  
Assistant City Manager Roger Bradley

Attachment: Comments received during the comment period (Appeal of the Draft Allocation for the County of Riverside (Unincorporated))

**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 (Appeal of the Draft Allocation for the County of Riverside (Unincorporated))



Southern California Association of Governments  
Remote Participation Only  
January 6, 2021

**To:** Regional Housing Needs Assessment (RHNA) Appeals Board

**EXECUTIVE DIRECTOR'S  
APPROVAL**

**From:** Kevin Kane, Senior Regional Planner,  
(213) 236-1828, kane@scag.ca.gov

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

**RECOMMENDED ACTION:**

Deny the appeal filed by the City of Calipatria (the City) to reduce the draft RHNA allocation for the City by 76 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 Calipatria requests a reduction of its RHNA allocation by 76 units (from 151 units to 75 units) based on changed circumstances (reducing households over the past ten years).

**RATIONALE FOR STAFF RECOMMENDATION:**

Staff have reviewed the appeal and recommend no change to the City of Calipatria’s RHNA allocation. The City proposed a reduction of 76 units based on decreasing population over the last ten years that is inconsistent with projections used by SCAG to develop the draft RHNA allocation. However, SCAG provided extensive opportunities through the Bottom-Up Local Input and Envisioning Process beginning in October 2017 and, in some form, until June 2020 yet did not receive growth forecast input from the City.

**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 Calipatria: 151 units

**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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Very Low Income: 36 units  
Low Income: 21 units  
Moderate Income: 16 units  
Above Moderate Income: 78 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 Calipatria. 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: Changed Circumstances [Government Code 65584.05(b)].***

*The City of Calipatria requests that its draft RHNA allocation be reduced by 76 units (from 151 units) due to changed circumstances. The City argues that the number of households has been decreasing over the past ten years, citing data from the State Department of Finance. The City does not anticipate positive growth in the upcoming planning period despite projected household growth reflected in the 2017 Calipatria Data/Map Book and draft RHNA allocation.*

**SCAG Staff Response:** 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". SCAG staff met with City staff in December 2017 and

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discussed SCAG's preliminary growth forecast; however, the City did not provide input or submit a Data Verification Form to suggest alternative household, population, or employment growth figures. While the initial deadline for input was October 2018, additional review opportunities were provided to all local jurisdictions through June 2020. See Attachment 1, "Local input and development of draft RHNA allocation" for details. Additionally, please note that while the City has provided evidence of modest decrease of *households* (decrease of 6 households), Government Code section 65584.04(g)(3) prohibits SCAG from considering stable *population* numbers during the previous RHNA cycle in determining the City of Calipatria's share of regional housing need.

Ultimately, SCAG provided numerous opportunities to the City of Calipatria to revise draft growth forecast information well in advance of its inclusion in the draft RHNA allocation in the form of email follow-ups following the December 2017 meeting, and through communications regarding the Connect SoCal Growth vision in October 2019, February 2020, and May 2020. 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 & Development of Draft RHNA Allocation (City of Calipatria)
2. City of Calipatria Appeal Request Form and Supporting Documentation
3. Comments received during the comment period

Southern California Association of Governments  
Remote Participation Only  
**City of Calipatria RHNA Appeal**  
**January 6, 2021**

### **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 Calipatria 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 Calipatria'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 Calipatria the anticipated number of households in 2020 was 1,295 and in 2030 was 1,468 (growth of 173 households). In December 2017, SCAG staff met with local jurisdiction staff to discuss the Bottom-Up Local Input and Envisioning Process and answer questions.

SCAG shared the Connect SoCal Vision of population, households, and employment at the neighborhood level and invited feedback from the City of Calipatria on October 31, 2019, February

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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://scagrtpsc.net/Pages/DataMapBooks.aspx>

21, 2020, and May 27, 2020 (with a deadline for local input indicated as June 9, 2020). The preliminary figures above were used by SCAG. SCAG did not receive any comments from the City of Calipatria in response.

**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 Calipatria 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. The City of Calipatria'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://scaq.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 Calipatria

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

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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).



Calipatria received its draft RHNA allocation on September 11, 2020. Application of the RHNA methodology yields the draft RHNA allocation for the City of Calipatria as summarized in the data and calculations in the tables below.

<b>Calipatria city statistics and inputs:</b>	
Forecasted household (HH) growth, RHNA period: <i>(2020-2030 Household Growth * 0.825)</i>	143
Percent of households who are renting:	49%
Housing unit loss from demolition (2009-18):	-
Adjusted forecasted household growth, 2020-2045: <i>(Local input growth forecast total adjusted by the difference between the RHNA determination and SCAG's regional 2020-2045 forecast, +4%)</i>	470
Percent of regional jobs accessible in 30 mins (2045): <i>(For the jurisdiction's median TAZ)</i>	0.23%
Jobs accessible from the jurisdiction's median TAZ (2045): <i>(Based on Connect SoCal's 2045 regional forecast of 10.049M jobs)</i>	23,000
Share of region's job accessibility (population weighted):	0.00%
Jurisdiction's HQTAs population (2045):	-
Share of region's HQTAs population (2045):	0.00%
Share of population in low/very low-resource tracts:	100.00%
Share of population in very high-resource tracts:	0.00%
Social equity adjustment:	180%

Calculation of Draft RHNA Allocation for Calipatria city	
Forecasted household (HH) growth, RHNA period:	143
Vacancy Adjustment <i>(5% for renter households and 1.5% for owner households)</i>	5
Replacement Need	-
<b>TOTAL PROJECTED NEED:</b>	<b>147</b>
Existing need due to job accessibility (50%)	3
Existing need due to HQTAs pop. share (50%)	0
Net residual factor for existing need <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>	0
<b>TOTAL EXISTING NEED</b>	<b>3</b>
<b>TOTAL RHNA FOR CALIPATRIA CITY</b>	<b>151</b>
Very-low income (<50% of AMI)	36
Low income (50-80% of AMI)	21
Moderate income (80-120% of AMI)	16
Above moderate income (>120% of AMI)	78

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 zero living within HQTAs, the City of Calipatria does not represent any 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 Calipatria's median TAZ, it will be possible to reach 0.23% of the region's jobs in 2045 within a 30-minute automobile commute (23,000 jobs), based on Connect SoCal's 2045 regional job forecast of 10,049,000 jobs.

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. "E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2020 with 2010 Census Benchmark" 22 Excel Sheets (State of California Department of Finance)
- 2.
- 3.

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_

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

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

Calipatria Population and Occupied Housing Units - DOF E-5 2020 vintage

Submitted by Calipatria as part of their 6th cycle RHNA appeal. Calipatria statistics extracted by SCAG staff.

Year	County	City	Population					Housing Units					Occupied	Vacancy Rate	Persons per Household
			Total	Household	Group	Quarters	Total2	Single	Detached	Single	Attached	Two to Four			
2010	Imperial	Calipatria	7,705	3,541	4,164	1,121	859	16	44	141	61	1,008	10.1%	3.51	
2011	Imperial	Calipatria	7678	3592	4086	1121	859	16	44	141	61	1007	0.101694915	3.567	
2012	Imperial	Calipatria	8008	3636	4372	1121	859	16	44	141	61	1004	0.104371097	3.622	
2013	Imperial	Calipatria	7095	3631	3464	1121	859	16	44	141	61	991	0.115967886	3.664	
2014	Imperial	Calipatria	7493	3643	3850	1121	859	16	44	141	61	988	0.118644068	3.687	
2015	Imperial	Calipatria	7415	3668	3747	1121	859	16	44	141	61	987	0.119536128	3.716	
2016	Imperial	Calipatria	7492	3655	3837	1121	859	16	44	141	61	979	0.126672614	3.733	
2017	Imperial	Calipatria	7524	3665	3859	1122	860	16	44	141	61	977	0.129233512	3.751	
2018	Imperial	Calipatria	7410	3666	3744	1122	860	16	44	141	61	971	0.134581105	3.775	
2019	Imperial	Calipatria	7141	3669	3472	1122	860	16	44	141	61	971	0.134581105	3.779	
2020	Imperial	Calipatria	6843	3654	3189	1122	860	16	44	141	61	971	0.134581105	3.763	

**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 (Appeal of the Draft RHNA Allocation for the City of Calipatria)

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 (Appeal of the Draft RHNA Allocation for the City of Calipatria)