



CITY OF GLENDALE, CALIFORNIA
Office of the Mayor

613 East Broadway, Suite 200
Glendale, California 91206-4391
Tel. 818 548-4844 Fax 818 547-6740
www.ci.glendale.ca.us

January 7, 2020

Mr. Doug McCauley
Acting Director
California Department of Housing and Community Development
2020 West El Camino Avenue
Sacramento, CA 95833

RE: REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) ALLOCATION METHODOLOGY

Dear Mr. McCauley:

The City of Glendale, would like to express concerns regarding the action taken by the Southern California Association of Governments (SCAG) Regional Council on November 7, 2019, to approve, through a substitute motion and a 43-19 vote, an alternative Regional Housing Needs Assessment (RHNA) allocation methodology; and our objection to the disproportionate draft RHNA allocation for the City of Glendale. This late change in the RHNA allocation methodology did not allow any time for Glendale or any other Los Angeles County city to object or even comment on this change.

Prior to the November 7th vote, the City of Glendale was informed by SCAG that its RHNA distribution for the 6th Cycle included a total of 9,804 units. After the November 7th vote by SCAG, the City of Glendale's RHNA distribution jumped to 14,000 amounting to a 42.8% increase. On the other hand, Riverside County cities saw a 10 to 20% reduction in their allocations. For instance, the City of Riverside had a reduction in its RHNA allocation by 10.7% (20,126 to 18,185) and the City of Moreno Valley allocation was reduced by 21% (16,275 to 13,495). Cities within San Bernardino County also saw reductions in RHNA allocations. For instance, the City of Fontana's RHNA allocations was reduced by 29% (22,101 to 17,141).

In addition, the alternative RHNA allocation methodology was not analyzed by SCAG staff prior to the November 7, 2019, vote and is not consistent with the RHNA allocation methodology reviewed and approved by the SCAG RHNA Subcommittee and the SCAG Community, Economic, and Human Development Committee.

The RHNA allocation methodology should be equitable and reflect local input that incorporates population, housing, and employment projections. This local input has always been a foundational component of SCAG's RHNA planning process and ensures consistency between the RHNA and the Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS).

Although the City of Glendale believes that the regional allocation of approximately 1.3 million housing units is unattainable, this total allocation determined by HCD should be more equitably allocated among all jurisdictions for the SCAG region. Especially give the goal of encouraging the development of more housing throughout the region.

EXHIBIT 7.

The City of Glendale respectfully requests that the California Department of Housing and Community Development reject the SCAG RHNA allocation methodology that was adopted by the SCAG Regional Council on November 7, 2019. Glendale strongly believes that the RHNA allocation methodology that reflects local input, is reasonable and equitable, is consistent with SCAG's stated goals, and allows communities to have local control over housing development and have their housing elements certified by the Department of Housing and Community Development (HCD). Not doing so may result in an RHNA allocation that is not achievable and one that will jeopardize the region's ability to successfully address California's housing crisis.

Sincerely,

A handwritten signature in cursive script that reads "Ara Najarian".

Ara Najarian
Mayor
City of Glendale