

Regional Housing Needs Assessment: Response to Board Requests – August 23, 2019

On July 26, 2019, the Board of Directors released for public comment a [draft methodology for the 6th Cycle Regional Housing Needs Assessment \(RHNA\)](#). The estimated allocation based upon the draft methodology is shown in Table 1. The estimated allocation is subject to changes if the draft methodology is modified by the Board of Directors due to comments from the public or the review for consistency with RHNA laws that will be performed by the California Department of Housing and Community Development. The RHNA laws can be found in the California Government Code starting at Section 65584.

Table 1: Estimated Allocation Per Income Category based on the Draft 6th Cycle RHNA Methodology

Jurisdiction	Very Low	Low	Moderate	Above Moderate	Total Estimated Allocation
Carlsbad	1,311	784	749	1,029	3,873
Chula Vista	2,750	1,777	1,911	4,667	11,105
Coronado	343	185	174	299	1,001
Del Mar	37	64	31	31	163
El Cajon	481	414	518	1,867	3,280
Encinitas	469	369	308	408	1,554
Escondido	1,864	1,249	1,527	4,967	9,607
Imperial Beach	233	127	190	825	1,375
La Mesa	859	487	577	1,874	3,797
Lemon Grove	295	166	193	705	1,359
National City	645	506	711	3,575	5,437
Oceanside	1,268	718	883	2,574	5,443
Poway	468	268	241	342	1,319
San Diego	27,510	17,311	19,297	43,783	107,901
San Marcos	728	530	542	1,316	3,116
Santee	406	200	188	425	1,219
Solana Beach	316	159	160	240	875
Unincorporated County	1,834	992	1,165	2,709	6,700
Vista	515	321	369	1,356	2,561
Region (Totals)	42,332	26,627	29,734	72,992	171,685

Several SANDAG Board members requested that staff provide additional information during the public comment period on potential modifications to the draft methodology. These requests pertain to the following topics:

1. Equal Weighting to Transit and Jobs Component
2. High Frequency Transit Stop Dataset
3. Increase Equity Adjustment

A description of each request, how each may or may not further the objectives in state law, and how each would change the estimated allocation are included below.

Several SANDAG Board members requested staff apply a methodology that recognizes challenges for small cities by potentially reducing the number of housing units in small cities. SANDAG staff consulted with the California Department of Housing Community Development (HCD) on the potential for small cities to receive a reduced allocation. HCD expressed concerns about an adjustment based on the size of a city rather than being an alteration to the methodology driven by data showing that the adjustment would further the objectives in RHNA law. HCD advised that such an adjustment would be seen as a red flag in the methodology that would likely lead to a negative response. HCD suggested that a small cities adjustment would not be justifiable or consistent with RHNA laws. Therefore, a description of a small cities' adjustment is not included in the information below.

Request #1: Equal Weighting to Transit and Jobs Component

More than one SANDAG Board member requested that staff apply a methodology that would weigh the transit and jobs components equally such that each would allocate 50 percent of the RHNA Determination (171,685 housing units). Table 2 shows an estimated allocation based on this request. Since 171,685 housing units cannot be split evenly, the component with one more housing unit is the jobs component.

Considerations

Providing equal weighting to the transit and jobs components could meet the objectives in state law as both the transit and jobs components can lead to reduced greenhouse gas reductions, promote infill development, and provide a mix of housing types to all jurisdictions.

Table 2: Estimated Allocation based on Request #1: Equal Weighting to Transit and Jobs Component

Jurisdiction	Transit Weighting: 50%	Jobs Weighting: 50%	Total Estimated Allocation	Difference from Draft Methodology
Carlsbad	836	3,980	4,816	943
Chula Vista	6,522	3,753	10,275	(830)
Coronado	-	1,430	1,430	429
Del Mar	-	232	232	69
El Cajon	1,254	2,357	3,611	331
Encinitas	418	1,445	1,863	309
Escondido	5,853	2,854	8,707	(900)
Imperial Beach	920	256	1,176	(199)
La Mesa	2,090	1,543	3,633	(164)
Lemon Grove	836	388	1,224	(135)
National City	3,135	1,944	5,079	(358)
Oceanside	2,926	2,342	5,268	(175)
Poway	-	1,884	1,884	565
San Diego	57,290	47,747	105,037	(2,864)
San Marcos	1,254	2,123	3,377	261
Santee	418	966	1,384	165
Solana Beach	418	474	892	17
Unincorporated County	836	8,019	8,855	2,155
Vista	836	2,106	2,942	381
Region (Totals)	85,842	85,843	171,685	-

Request #2: High Frequency Transit Stop Dataset

One SANDAG Board member requested that staff apply a methodology that uses “high frequency transit stops” instead of “major transit stops” to calculate the proximity to transit component. The definitions for “high frequency transit stops” and “major transit stops” are included below.

- High Frequency Transit (HFT) Stops: Stops or stations served by high frequency transit as defined as local bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.
- Major Transit Stops: The intersection of two or more major local bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

The high frequency transit stops and major transit stops data are included in Table 3 for reference. Table 4 shows an estimated allocation based on this request.

Considerations

Using high frequency transit stops instead of major transit stops to calculate the proximity to transit component could meet the objectives in state law, as housing units would be allocated to areas with access to transit. Major transit stops are recognized in state law as places where development can occur with fewer environmental impacts including fewer vehicle miles traveled. For these reasons, the use of major transit stops was recommended by both the RHNA Subcommittee and the Regional Planning Technical Working Group.

Table 3: Transit Data – High Frequency Transit and Major Transit Stops

Jurisdiction	High Frequency Transit Stops	Share of High Frequency Stops	Major Transit Stops	Share of Major Transit Stops
Carlsbad	-	-	-	-
Chula Vista	126	11.07%	18	12.86%
Coronado	29	2.55%	-	-
Del Mar	-	-	-	-
El Cajon	22	1.93%	-	-
Encinitas	-	-	-	-
Escondido	-	-	-	-
Imperial Beach	26	2.28%	6	4.29%
La Mesa	7	0.62%	-	-
Lemon Grove	-	-	-	-
National City	78	6.85%	15	10.71%
Oceanside	41	3.60%	-	-
Poway	-	-	-	-
San Diego	789	69.33%	101	72.14%
San Marcos	-	-	-	-
Santee	-	-	-	-
Solana Beach	-	-	-	-
Unincorporated County	9	0.79%	-	-
Vista	11	0.97%	-	-
Region (Totals)	1,138	100%	140	100%

Table 4: Estimated Allocation based on Request #2: High Frequency Transit Stops Data Set

Jurisdiction	Transit Weighting: 65%	Jobs Weighting: 35%	Total Estimated Allocation	Difference from Draft Methodology
Carlsbad	1,087	2,786	3,873	-
Chula Vista	7,980	2,627	10,607	(498)
Coronado	711	1,001	1,712	711
Del Mar	-	163	163	-
El Cajon	2,170	1,650	3,820	540
Encinitas	543	1,011	1,554	-
Escondido	7,609	1,998	9,607	-
Imperial Beach	637	179	816	(559)
La Mesa	2,889	1,080	3,969	172
Lemon Grove	1,087	272	1,359	-
National City	2,999	1,361	4,360	(1,077)
Oceanside	4,810	1,639	6,449	1,006
Poway	-	1,319	1,319	-
San Diego	73,692	33,423	107,115	(786)
San Marcos	1,630	1,486	3,116	-
Santee	543	676	1,219	-
Solana Beach	543	332	875	-
Unincorporated County	1,308	5,613	6,921	221
Vista	1,357	1,474	2,831	270
Region (Totals)	111,595	60,090	171,685	-

Request #3: Increase Equity Adjustment

A SANDAG Board member requested that staff apply a methodology that intensifies the equity adjustment. The equity adjustment increases a jurisdiction’s share of its housing allocation in an income category where the jurisdiction has a smaller share of households in that category than the region and vice versa. A potential application of this request could apply a 20 percent weighting to the equity adjustment to increase the relative difference between a jurisdiction’s share and the region’s share, therefore, amplifying the effect.

To demonstrate how an increase to the equity adjustment might be accomplished, a weight of 20 percent was chosen to intensify the effects of the equity adjustment while still allowing for an allocation that improves the mix, tenure, and affordability of housing in each jurisdiction, as required in Government Code Section 65584.

Table 5 shows an estimated allocation based on this request, which assigns a weighting of 20 percent to the equity adjustment.

Considerations

Using a 20 percent weighting to the equity adjustment could meet the objectives in state law. State law objectives for RHNA include promotion of socioeconomic equity and allocation of a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income area compared to the countywide distribution in that category.

Table 5: Estimated Allocation based on Request #3: Increased Equity Adjustment

Jurisdiction	Very Low	Low	Moderate	Above Moderate	Total Estimated Allocation
Carlsbad	1,385	819	793	876	3,873
Chula Vista	1,939	1,858	1,347	5,961	11,105
Coronado	365	195	185	256	1,001
Del Mar	39	65	33	26	163
El Cajon	312	265	505	2,198	3,280
Encinitas	495	386	325	348	1,554
Escondido	1,314	871	1,077	6,345	9,607
Imperial Beach	157	84	128	1,006	1,375
La Mesa	614	344	412	2,427	3,797
Lemon Grove	209	115	136	899	1,359
National City	421	326	463	4,227	5,437
Oceanside	917	513	638	3,375	5,443
Poway	494	280	254	291	1,319
San Diego	29,926	18,619	20,993	38,363	107,901
San Marcos	482	520	538	1,576	3,116
Santee	462	226	142	389	1,219
Solana Beach	334	167	169	205	875
Unincorporated County	2,107	751	1,338	2,504	6,700
Vista	360	223	258	1,720	2,561
Region (Totals)	42,332	26,627	29,734	72,992	171,685