

Regional Housing Needs Assessment: Frequently Asked Questions

1. What data and assumptions did SANDAG rely on in developing the draft RHNA methodology?

SANDAG relied on the data it maintains on jobs, housing and transportation for the region and on data provided by the jurisdictions, community based organizations, and the public during the many public meetings it held on the topic of the RHNA Plan. The information relied upon is described in the [draft methodology for the 6th Cycle Regional Housing Needs Assessment \(RHNA\)](#).

2. Do the RHNA laws require that SANDAG have a public comment period on the draft RHNA methodology that lasts for a particular number of days?

No. Although prior versions of the RHNA laws contained a particular number of days, the section of the law that provides for a public comment period (Section 65584.04(d)) no longer requires that the comment period last for a particular length of time.

3. Why isn't the breakdown (or allocation) of RHNA units to each city included in the draft methodology?

Housing law provides two separate approval processes for the methodology and the allocation, which is why the allocation is not included in the methodology document. Following the Board of Director's adoption of a methodology, the draft allocation will be distributed to the jurisdictions consistent with Section 65584.05.

4. Can SANDAG decide on a number of housing units to allocate to jurisdictions first and then back into a methodology that results in the predetermined number of units?

No. This is not the way the Legislature designed the RHNA laws. SANDAG is required to determine the methodology first using the factors and objectives in Sections 65584 and 65584.04. Then, after SANDAG submits the methodology to the California Department of Housing and Community Development and adopts the final methodology, SANDAG is required to distribute the allocations to the jurisdictions pursuant to Section 65584.05. The methodology and allocation procedures are separated into different statutes with two different review processes. Right now, SANDAG is in the RHNA Plan phase of determining the methodology, not the allocation.

5. Can SANDAG limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality?

No. See Section 65584.04(e)(2)(B).

6. When developing the methodology can SANDAG consider a jurisdiction's ordinances, policies, voter-approved measures or standards that directly or indirectly limits the number of residential building permits issued?

No. See Section 65584.04(g)(1).

7. Can a jurisdiction’s prior inability to meet its RHNA allocation numbers in a prior RHNA cycle be taken into consideration when SANDAG is preparing its methodology?

No. See Section 65584.04(g)(2).

8. Can information received by SANDAG from a local government be used as a basis for reducing the total housing need established for the region?

No. See Section 65584.04(b)(4). The regional housing need (also known as the RHNA Determination) for the San Diego region is 171,685 housing units. It was determined by the Department of Housing and Community Development in consultation with SANDAG and cannot be changed. The Board of Directors voted to accept the HCD RHNA Determination at its [June 8, 2018](#), meeting.

9. Can SANDAG take Federal Emergency Management Agency (FEMA) or Department of Water Resources information regarding areas subject to flooding into consideration when determining what land is suitable for urban development?

Yes. See Section 65584.04 (e)(2)(B). SANDAG reviewed FEMA data on flood plains to determine the acreage of floodplain land areas in each jurisdiction as a share of the jurisdiction’s land acres. The table below shows the percentage of land acres within a flood plain. With the exception of the cities of Del Mar and Imperial Beach, the acreage of land at risk of flooding in each jurisdiction makes up less than ten percent of the jurisdiction’s land acres. Following allocation of housing units, individual jurisdictions will undergo the process of updating their general plans to accommodate the housing need. It is during this local planning process that jurisdictions may consider limitations such as risk of flooding when planning for where housing can be accommodated.

Jurisdiction	Total Acres	Land Acres	Land Acres in Flood Plain	% of Land Acres in a Flood Plain
Carlsbad	25,028	24,189	1,202	5.0%
Chula Vista	33,354	31,967	1,629	5.1%
Coronado	9,021	5,132	168	3.3%
Del Mar	1,144	1,078	397	36.8%
El Cajon	9,303	9,303	161	1.7%
Encinitas	12,531	12,292	752	6.1%
Escondido	23,971	23,905	714	3.0%
Imperial Beach	2,842	2,797	868	31.0%
La Mesa	5,783	5,783	15	0.3%
Lemon Grove	2,504	2,504	51	2.0%
National City	5,908	4,801	387	8.1%
Oceanside	26,991	26,909	1,339	5.0%
Poway	25,039	25,037	708	2.8%
San Diego	219,200	210,757	15,611	7.4%
San Marcos	15,595	15,595	646	4.1%
Santee	10,686	10,686	539	5.0%
Solana Beach	2,184	2,181	37	1.7%
Unincorporated County	2,283,964	2,276,211	54,183	2.4%
Vista	11,944	11,944	267	2.2%
Region (Totals)	2,726,992	2,703,071	79,674	2.9%

10. Can SANDAG consider factors to develop the methodology that are not specifically listed as factors in the RHNA laws?

Yes, as long as the factor considered will still further the objectives in Section 65584(d); if the additional factor is unrelated to the objectives in state law, then the Board of Directors must establish that the additional factor does not undermine the objectives in state law, the factor is applied equally across all household income levels, and ~~SANDAG can make a finding that the factor~~ it is necessary to address significant health and safety conditions. See Section 65584.04(e)(12).

11. Can SANDAG take sea level rise into consideration when determining what land is suitable for urban development?

Sea level rise is not specifically included among the objectives and factors in state law that must be considered in the development of a RHNA methodology. The Board of Directors, at its discretion, may pursue sea level rise as a factor pursuant to Government Code Section 65584.04(e)(12). See response to Question 9.

12. What data and methodology were used to determine the health and safety impacts caused by increased urban development and traffic/congestion/safety/air quality to the jurisdictions?

The draft methodology does not include this factor and it is not required to do so by RHNA laws; however, the Board of Directors, at its discretion, may pursue additional factors pursuant to Government Code Section 65584.04(e)(12). See response to Question 9. SANDAG has included promotion of achievement of the region's greenhouse gas reduction target into the draft methodology as required by Section 65584(d)(5).

13. What data and methodology were used to determine that military housing was not considered in the equation?

At its July 26, 2019, meeting, the Board of Directors voted to release a draft methodology for public comment that does not include an adjustment for housed military in the jobs data. The Board's deliberations and reasoning can be heard by listening to the [audio recording](#) of the meeting (Item 23).

14. What data and methodology were used to determine if the transit system in Coronado would facilitate shorter commutes considering SANDAG's regional mass transit plan is not a viable system that facilitates shorter commutes in and out of Coronado to job sites scattered throughout the San Diego Region?

The draft methodology uses existing rail & *Rapid* stations and major transit stops as part of the transit component. Based on the definitions of these transit services, Coronado does not have any rail, *Rapid*, or major transit stops within its boundaries and, therefore, does not receive a housing allocation based on the transit component.

15. *NEW* How is the equity adjustment calculated?

In calculating the equity adjustment, a jurisdiction's share of households in an income category is compared to the region's share of households in the same income category by determining the relative difference between the two percentages. The relative difference is found by taking the inverse ratio of a jurisdiction's share of households within an income category to the region's share. See formula below, with the very low income category as an example.

$$= 1 / (\text{Jurisdiction's Percent of Very Low Households} / \text{Regional Percent of Very Low Households})$$

The relative difference is used as a scaling factor that adjusts the region's percentage of households in an income category (e.g. 24.7 percent for very low income) and uses this adjusted percentage as the jurisdiction's share of its housing allocation for that income category. Table 5 demonstrates how the equity adjustment works. In the table, a scaling factor greater than one causes an upward adjustment and a scaling factor less than one causes a downward adjustment. The percentage being adjusted is the region's share of households in the income category, which also is the regional housing allocation for the income category as determined by HCD. This is included in the top row of Table 1.

The equity adjustment increases a jurisdiction's share of its housing allocation in an income category if the jurisdiction has a smaller share of households in that category than the region. Conversely, the adjustment decreases a jurisdiction's share of its housing allocation in an income category if the jurisdiction has a greater share of households in that category than the region. In this way, the equity adjustment seeks to increase jurisdictions' mix of housing (housing for each income category) and combat historical patterns of segregation. Below are two examples of how the equity adjustment in the draft methodology is applied to the cities of Carlsbad and National City, chosen for comparison purposes.

Example A

In Carlsbad, 16.3 percent of households are very low income. In the region, 24.7 percent of households are very low income. Carlsbad's share of very low income households is less than the region's. This means, using the equity adjustment in the draft methodology, Carlsbad receives a greater share (greater than 24.7 percent) of its housing unit allocation in the very low income category. In fact, 37.4 percent of Carlsbad's housing units are in the very low income category.

Example B

Conversely, 40.6 percent of households in National City are very low income. This is much greater than the region's 24.7 percent of households. Therefore, based on the equity adjustment in the draft methodology, National City receives a smaller share (less than 24.7 percent) of its housing unit allocation in the very low income category. Only 15 percent of National City's housing units are in the very low income category.

Table 1: Equity Adjustment Calculation

RHNA Determination	Very Low			24.7%	Low			15.5%	Moderate			17.3%	Above Moderate			42.5%
Jurisdiction	% Households	Scaling Factor (↑ or ↓ adjustment)	% Housing Allocation	% Households	Scaling Factor (↑ or ↓ adjustment)	% Housing Allocation	% Households	Scaling Factor (↑ or ↓ adjustment)	% Housing Allocation	% Households	Scaling Factor (↑ or ↓ adjustment)	% Housing Allocation	% Households	Scaling Factor (↑ or ↓ adjustment)	% Housing Allocation	
Carlsbad	16.3%	1.52 ↑	37.4%	10.8%	1.43 ↑	22.2%	13.8%	1.25 ↑	21.7%	59.1%	0.72 ↓	30.6%				
Chula Vista	25.0%	0.99 ↓	24.3%	15.4%	1.01 ↑	15.6%	17.5%	0.99 ↓	17.1%	42.0%	1.01 ↑	43.0%				
Coronado	16.8%	1.47 ↑	36.3%	12.3%	1.26 ↑	19.5%	16.1%	1.08 ↑	18.7%	54.9%	0.78 ↓	33.0%				
Del Mar	19.0%	1.29 ↑	31.9%	4.5%	3.44 ↑	53.3%	11.0%	1.58 ↑	27.3%	65.5%	0.65 ↓	27.6%				
El Cajon	37.8%	0.65 ↓	16.1%	17.5%	0.89 ↓	13.8%	17.0%	1.02 ↑	17.6%	27.7%	1.53 ↑	65.2%				
Encinitas	18.1%	1.36 ↑	33.6%	9.2%	1.69 ↑	26.3%	13.4%	1.29 ↑	22.3%	59.3%	0.72 ↓	30.5%				
Escondido	30.7%	0.80 ↓	19.8%	18.2%	0.85 ↓	13.2%	18.2%	0.95 ↓	16.4%	32.8%	1.29 ↑	55.0%				
Imperial Beach	31.9%	0.77 ↓	19.0%	23.3%	0.67 ↓	10.3%	19.1%	0.91 ↓	15.7%	25.7%	1.65 ↑	70.3%				
La Mesa	26.8%	0.92 ↓	22.7%	18.8%	0.82 ↓	12.8%	19.4%	0.89 ↓	15.5%	35.0%	1.21 ↑	51.6%				
Lemon Grove	27.4%	0.90 ↓	22.2%	19.4%	0.80 ↓	12.4%	20.4%	0.85 ↓	14.7%	32.8%	1.30 ↑	55.1%				
National City	40.6%	0.61 ↓	15.0%	20.6%	0.75 ↓	11.7%	17.9%	0.96 ↓	16.7%	20.9%	2.04 ↑	86.5%				
Oceanside	26.3%	0.94 ↓	23.1%	18.5%	0.84 ↓	13.0%	18.4%	0.94 ↓	16.3%	36.9%	1.15 ↑	49.0%				
Poway	15.3%	1.61 ↑	39.7%	10.6%	1.46 ↑	22.7%	14.4%	1.20 ↑	20.8%	59.6%	0.71 ↓	30.3%				
San Diego	24.3%	1.02 ↑	25.0%	15.4%	1.01 ↑	15.7%	16.9%	1.03 ↑	17.8%	43.5%	0.98 ↓	41.5%				
San Marcos	26.5%	0.93 ↓	23.0%	14.5%	1.07 ↑	16.6%	17.3%	1.00 ↑	17.3%	41.8%	1.02 ↑	43.3%				
Santee	17.9%	1.38 ↑	34.0%	14.4%	1.08 ↑	16.7%	18.9%	0.92 ↓	15.9%	48.8%	0.87 ↓	37.0%				
Solana Beach	15.4%	1.61 ↑	39.6%	12.1%	1.28 ↑	19.8%	14.9%	1.17 ↑	20.2%	57.7%	0.74 ↓	31.4%				
Unincorporated County	22.5%	1.09 ↑	27.0%	16.6%	0.93 ↓	14.5%	17.3%	1.00 ↑	17.4%	43.6%	0.98 ↓	41.5%				
Vista	29.4%	0.84 ↓	20.7%	18.8%	0.83 ↓	12.8%	20.0%	0.87 ↓	15.0%	31.8%	1.34 ↑	56.8%				

16. *NEW* How does the draft methodology take into account companion units and new residential units that have been converted to short term vacation rentals?

The RHNA methodology does not take into account unit types. That is decided by the local jurisdictions through preparation of the housing element in consultation with HCD following the housing unit allocations.