

Appendix K:

Regional Housing Needs Assessment Plan

Final
December 2021

Appendix K: Regional Housing Needs Assessment Plan

The allocation of, and planning for, the region's future housing needs occurs in the Regional Housing Needs Assessment (RHNA) process governed by Government Code Sections 65580, et seq. The RHNA process helps the region meet its housing needs in four income categories (very low, low, moderate, and above moderate), address transportation needs for a growing population, and reduce vehicle miles traveled. This appendix includes the 6th Cycle Regional Housing Needs Assessment Plan¹ (RHNA Plan) for the San Diego region, which covers the years 2021 through 2029.

California Assembly Bill 1730

On October 8, 2019, the Governor signed California Assembly Bill 1730 (Gonzalez, 2019) (AB 1730) into law, which provided for a two-year extension to update the Regional Transportation Plan and Sustainable Communities Strategy (SCS) for the San Diego region and ensured that San Diego Forward: The 2015 Regional Plan (2015 Regional Plan), its SCS, and related environmental analysis remained valid for state compliance, funding eligibility, and other purposes through 2021. AB 1730 also maintained the April 2021 due date for local jurisdictions to update their general plan housing elements and provided that the San Diego Association of Governments (SANDAG) could carry out the 6th Cycle RHNA process required by state law ahead of the adoption of San Diego Forward: The 2021 Regional Plan (2021 Regional Plan).

Regional Housing Needs Assessment Plan

In July 2020, the SANDAG Board of Directors adopted the RHNA Plan, which allocates housing units to jurisdictions based on each jurisdiction's share of transit and jobs within the region. It also includes an equity adjustment 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 compared to the regional share. Consistent with AB 1730, each local jurisdiction had until April 2021 to update its housing element to accommodate the RHNA Plan housing unit allocations.

The RHNA Plan provides consistency between the development pattern in the 2015 SCS adopted with the 2015 Regional Plan and allocation of housing units within the region as required by AB 1730. The 2015 SCS aimed to move the region toward greater sustainability by focusing on housing and job growth in urbanized areas where there is existing and planned transportation infrastructure, including transit. By focusing the methodology on

¹ 6th Cycle Regional Housing Needs Assessment Plan: sandag.org/uploads/projectid/projectid_189_27782.pdf.

jurisdictions' shares of transit and jobs, the majority of the housing units are allocated to the region's existing urbanized areas, consistent with the development pattern described in the 2015 SCS.

As work continued on the 2021 Regional Plan, the RHNA Plan informed development of the SCS land use pattern, setting forth a forecasted development pattern for the region. The SCS land use pattern identifies areas within the region sufficient to house the projected regional housing need determined by the California Department of Housing and Community Development, includes housing unit assumptions for each jurisdiction that meet the housing unit allocations in the RHNA Plan, and prioritizes Mobility Hub areas and Smart Growth Opportunity Areas for future development. Additional information about the SCS land use pattern can be found in Appendix F: Regional Growth Forecast and Sustainable Communities Strategy Land Use Pattern.

In September 2020, the cities of Coronado, Imperial Beach, Lemon Grove and Solana Beach filed a Petition for Writ of Mandate in San Diego Superior Court, challenging, among other things, the Board of Directors' adoption of the RHNA Plan. SANDAG demurred to the cities' Writ Petition and the demurrer was sustained by the court in February 2021. The petitioning cities have appealed the ruling on the demurrer to their Writ Petition, and that appeal remains pending in the Fourth District Court of Appeal.

**Appendix K Attachment 1:
6th Cycle Regional Housing Needs
Assessment Plan**



FINAL

**6th Cycle
Regional Housing
Needs Assessment Plan**

SANDAG

July 10, 2020

Acknowledgments

Many individuals aided in the preparation of materials contained in the Regional Housing Needs Assessment (RHNA) Plan. In particular, the cooperation and involvement of the following San Diego Association of Governments (SANDAG) committees and working groups are acknowledged:

Regional Planning Technical Working Group and Housing Stakeholders

Community-Based Organizations Working Group

Regional Planning Committee

Regional Housing Needs Assessment Subcommittee

SANDAG Staff:

Hasan Ikhata, Executive Director

Ray Traynor, Chief Planning and Innovation Officer

Coleen Clementson, Director of Regional Planning

Ray Major, Chief Data Analytics Officer/Chief Economist

Julie Wiley, Director of Contracts and Grants

Seth Litchney, Project Manager/Senior Regional Planner

Daniel Flyte, Senior Programmer Analyst

Rachel Cortes, Senior Researcher and Modeler

Grace Chung, Senior GIS Analyst

Audrey Porcella, Grants Planning Associate

Samantha Foulke, Associate Legal Counsel

Tom King, Associate Researcher and Modeler

Aremy Barrera, Document Processing Specialist III

Karyn Thompson, Associate Graphic Designer

Ryan Chung, Associate Graphic Designer

Samuel Solis, Regional Planning Intern

Jose Luis Ayala, Former Regional Planning Intern

Contents

- Executive Summary..... 3
- Introduction..... 5
 - RHNA Process 5
 - HCD’s RHNA Determination..... 6
 - SANDAG RHNA Plan Requirements..... 7
 - Housing Element Update 9
- SANDAG Oversight of the 6th Cycle RHNA Process 10
 - Stakeholder Outreach 10
 - Board of Directors 10
 - Regional Housing Needs Assessment Subcommittee..... 12
 - Regional Planning Technical Working Group 12
 - Regional Planning Committee 12
 - Public 13
 - Public Hearing and Comment Period..... 13
 - HCD Methodology Review 13
 - Appeals Period and Adoption of the Final RHNA Plan..... 14
- Methodology and Allocation 15
 - RHNA Methodology 15
 - Transit 17
 - Jobs..... 20
 - Equity Adjustment 22
 - Final RHNA Allocation 26
- Objectives and Factors..... 28
 - Objectives 28
 - Factors 31
- What’s Next..... 38
- Appendix A – Final RHNA Determination 39
- Appendix B – HCD Findings on Draft RHNA Methodology 39
- Appendix C – SANDAG Resolution No. 2020-13..... 39
- Appendix D – SANDAG Resolution No. 2021-02 51

1

Executive Summary

The San Diego region is in the midst of a housing crisis. Housing prices and rents have steadily increased during the last decade, outpacing inflation¹; putting home ownership out of reach for many residents and affecting the quality of life in the region. High housing costs cause significant challenges for low-income residents, retired residents on a fixed income, and young San Diegans who wish to stay in the region. More and more residents are unable to afford housing, leading to residents paying a greater share of their income on housing or leaving the region. Additionally, the crisis has affected local businesses and the regional economy; attracting new businesses and employees has become more challenging and costly due to unaffordable housing in the region.



The San Diego Association of Governments (SANDAG) Board of Directors took action to address the housing crisis. Recognizing the need for more housing for people of all income levels, SANDAG accepted the California Department of Housing and Community Development’s (HCD) determination of 171,685 housing units needed in the region between 2021 and 2029. SANDAG is addressing the housing crisis by planning for more housing and making more housing available throughout the region.

The location of housing has played an important role in the development of the San Diego region. From post-war sprawl to smart growth, housing location shapes the way residents travel, conduct business, and participate in daily activities. For decades, housing growth in San Diego was characterized by low-density units located farther away from business centers and existing development, reducing the amount of open space and natural habitat and increasing traffic on roads and highways.

Recently, the region’s priorities for growth have changed. [San Diego Forward: The 2015 Regional Plan](#) (2015 Regional Plan)² sets a strategy for sustainability that focuses housing and job growth in urban areas where there is existing and planned transportation infrastructure, protects the environment and helps ensure the success of smart growth land use policies by preserving sensitive habitat and open space, and addresses the housing needs of all economic segments of the population.

State law requires SANDAG’s housing unit allocation further multiple objectives. In addition to the existing requirements to promote infill development and improve the regional jobs/housing relationship, new legislation requires the allocation to reduce greenhouse gases (GHGs) and provide a more equitable distribution of housing units that furthers fair housing and overcomes patterns of discrimination.

¹ [SANDAG Info Bits – Housing in the San Diego Region: Building Permits, Costs, and Vacancies](#)

² [Government Code 65584.045](#) – The resolution approving the RHNA Plan for SANDAG’s sixth revision shall use the Sustainable Communities Strategy in the regional transportation plan adopted by SANDAG on October 9, 2015, to demonstrate the consistency determinations.

The RHNA Plan meets the sustainability strategies of the 2015 Regional Plan and state housing objectives by allocating housing to jurisdictions based on the availability of transit and jobs. In the long term, housing located near transit and jobs should provide opportunities for residents to take more trips by bus or train and live closer to where they work, reducing vehicle miles traveled (VMT) and GHG emissions. The methodology to distribute the regional housing need seeks to allocate more housing units for low- and very-low-income residents in places that have not historically had housing units available for these residents. It also prioritizes low-income housing in high opportunity areas with better schools, more economic opportunity, and fewer environmental hazards.

The RHNA Plan was crafted to address these important topics while remaining understandable to engage the public in this critical regional issue. The methodology and allocation were developed through an extensive outreach process to ensure local jurisdictions, housing organizations, and the public were able to weigh in on the priorities in the methodology.

Upon the adoption of the RHNA Plan, cities and the County of San Diego are required to update their general plans, housing elements, and zoning codes to accommodate the housing unit allocation as shown in Table 1.1. While the RHNA process will conclude once the local plans are updated, the challenge of providing more housing will continue. Encouraging and constructing more infill housing development will require the efforts of multiple government and non-government agencies. SANDAG will continue to work with the State of California, housing organizations, and local governments to find ways to increase housing production throughout the region.

Table 1.1: 6th Cycle RHNA Allocation

Jurisdiction	Very Low	Low	Moderate	Above Moderate	Total Allocation
Carlsbad	1,311	784	749	1,029	3,873
Chula Vista	2,750	1,777	1,911	4,667	11,105
Coronado	312	169	159	272	912
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	225	123	183	798	1,329
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	27,549	17,331	19,319	43,837	108,036
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

2 Introduction

The preparation of the RHNA Plan for the San Diego region is a responsibility assigned to SANDAG and other California councils of governments by state housing element law.³ The RHNA process is undertaken prior to each housing element cycle. This RHNA Plan is for the sixth housing element cycle, which covers an eight-year planning period (April 15, 2021 – April 15, 2029).

The RHNA Plan includes:

- A description of the RHNA process
- A summary of the public outreach used to prepare the RHNA Plan
- An overview of the methodology developed to allocate the region’s housing needs in four income categories
- A description of how the RHNA Plan implements the [2015 Regional Plan](#) and furthers the objectives and factors contained in state law

RHNA Process

State law requires the State of California, every regional council of governments, and every city and county to participate in the RHNA process, which has four phases:

- 1. RHNA Determination** – HCD in consultation with SANDAG, calculates a demographic housing need for the region based on headship and vacancy rates, household size, and other factors in state law; then it is divided into four income categories.
- 2. RHNA Methodology** – SANDAG prepares a draft methodology, which will be used to allocate a share of the RHNA determination to each jurisdiction in four income categories. The draft methodology is sent to HCD for review and comment to determine whether it furthers the objectives in state law. Following HCD’s review SANDAG adopts the final methodology.



RHNA Intent

To ensure housing was planned for in each city and county in the state, the State Legislature declared the following in state law:

- The availability of housing is of vital statewide importance
- Decent housing and a suitable living environment for every Californian is a priority of the highest order
- This goal requires the cooperative participation of government and the private sector to expand housing opportunities
- Local and state governments have a responsibility to facilitate the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community

See Government Code Section 65580.

³ [California Government Code Section 65580 et seq.](#)

3. **RHNA Plan** – Using the adopted methodology, the RHNA Plan includes an allocation of housing units to each jurisdiction in four income categories.
4. **Housing Element Updates** – Each jurisdiction must update its housing element to accommodate the RHNA Plan housing allocation.

HCD’s RHNA Determination

In March 2018, HCD prepared a draft RHNA Determination for the San Diego region using the following data:

- Population forecast from the California Department of Finance (DOF)
- Projected number of new households formed
- Vacancy rate in existing housing stock
- Percentage of renter’s households that are overcrowded, defined as more than one person per room per dwelling unit
- Housing replacement needs

State law requires HCD to consult with SANDAG to develop the final RHNA Determination. The consultation process included a review of HCD’s calculations and data sources and presentations to the Regional Planning Technical Working Group (TWG), Regional Planning Committee (RPC), and the Board.

In June 2018, the Board directed staff to submit comments to HCD accepting the draft RHNA Determination. The consultation process concluded when HCD submitted the final RHNA Determination to SANDAG in July 2018.

The final RHNA Determination (Appendix A) requires SANDAG and its member agencies to plan for a total of 171,685 housing units through the 2021-2029 planning period to address the region’s housing needs. Table 2.1 shows the housing unit need by income category.

Table 2.1: Regional Housing Needs Assessment Determination

Income Category	Housing Units Needed	Percent
Very Low	42,332	24.7%
Low	26,627	15.5%
Moderate	29,734	17.3%
Above Moderate	72,992	42.5%
Total	171,685	100.0%



SANDAG RHNA Plan Requirements

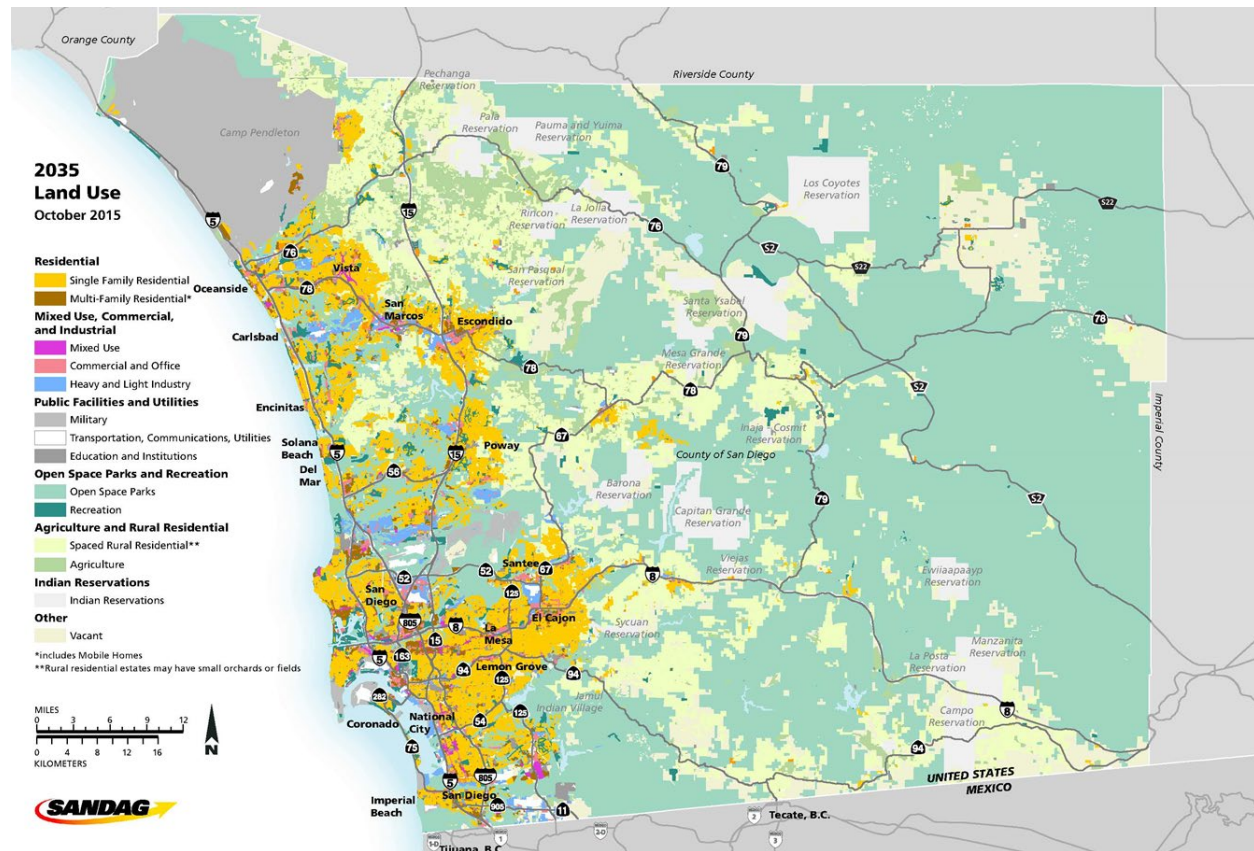
The RHNA Plan is required by state law to allocate housing units within the region in a manner consistent with the development pattern included in the Sustainable Communities Strategy (SCS). Included in the 2015 Regional Plan, the SCS aims to move the region toward greater sustainability by focusing on housing and job growth in urbanized areas where there is existing and planned transportation infrastructure, including transit; and addressing the housing needs of all economic segments of the population. The RHNA Plan implements and fulfills the goals of the SCS by using a methodology that allocates housing based on availability of transit and jobs, with a focus on equitably distributing low-income housing throughout the region. The majority (96%) of the housing units are allocated to incorporated cities. Therefore, housing will be planned for in the region's existing urbanized areas, consistent with the development pattern described in the SCS.

The SCS includes five sustainability strategies furthered by the RHNA Plan housing unit allocation. The first strategy focuses housing and job growth in urbanized areas where there is existing and planned transportation infrastructure, including transit. The RHNA Plan specifically allocates housing units in the region based on the location of commuter and light rail, *Rapid* buses, and major transit stops.

San Diego Forward: The 2015 Regional Plan Sustainability Strategies

- Focus housing and job growth in urbanized areas where there is existing and planned transportation infrastructure, including transit
- Protect the environment and help ensure the success of smart growth land use policies by preserving sensitive habitat, open space, cultural resources, and farmland
- Invest in a transportation network that gives people transportation choices and reduces GHG emissions
- Address the housing needs of all economic segments of the population
- Implement the Regional Plan through incentives and collaboration

Figure 2.1: 2035 Land Use



The second strategy calls for protecting the environment and ensuring the success of smart growth land use policies by preserving sensitive habitat, open space, cultural resources, and farmland. The RHNA Plan allocates a vast majority of the housing units in the existing urban areas; a discussion of how open space, habitat, and farmland are preserved by allocating housing units in the region's urban areas is discussed in this report.

The third strategy calls for investment in a transportation network that gives people transportation choices and reduces GHG emissions. Consistent with state law, the RHNA Plan prioritizes the reduction of VMT and GHG emissions by locating housing near jobs and transit. Housing growth near transit will provide choices for the region's residents on how they get to work, school, or other areas of interest.

The fourth strategy focuses on addressing the housing needs of all economic segments of the population. The RHNA Determination found that over 40% of the housing units needed in the region are for low- and very-low-income residents (Table 2.1). The RHNA Plan allocates low- and very-low income housing units for these residents in every jurisdiction. Further, the RHNA Plan allocates more low- and very-low income units in jurisdictions that have fewer existing low- and very-low income households. The equity adjustment seeks to increase jurisdictions' mix of housing affordability and furthers fair housing by providing units for all economic segments of the population in all areas throughout the region.

Lastly, the fifth strategy calls for implementation through incentives and collaboration. The RHNA Plan was developed through a collaborative process with local government staff, elected officials, the public, and housing stakeholders providing valuable input. SANDAG plans to implement the SCS through the development of a housing incentive program. Permitting and constructing 171,685 housing units in the region will take the collaboration of government at all levels.

State law⁴ requires the RHNA Plan to further five objectives related to housing supply, infill development, jobs/housing relationship, equity, and fair housing, and requires that 12 factors be considered in the development of the methodology to allocate housing units. The Methodology and Allocation section of this report describes how the RHNA Plan furthers these objectives and considers each of the factors in state law.

Regional Housing Needs Assessment Plan Objectives

Government Code 65584(d)

The regional housing needs allocation plan shall further all 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.
- (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.

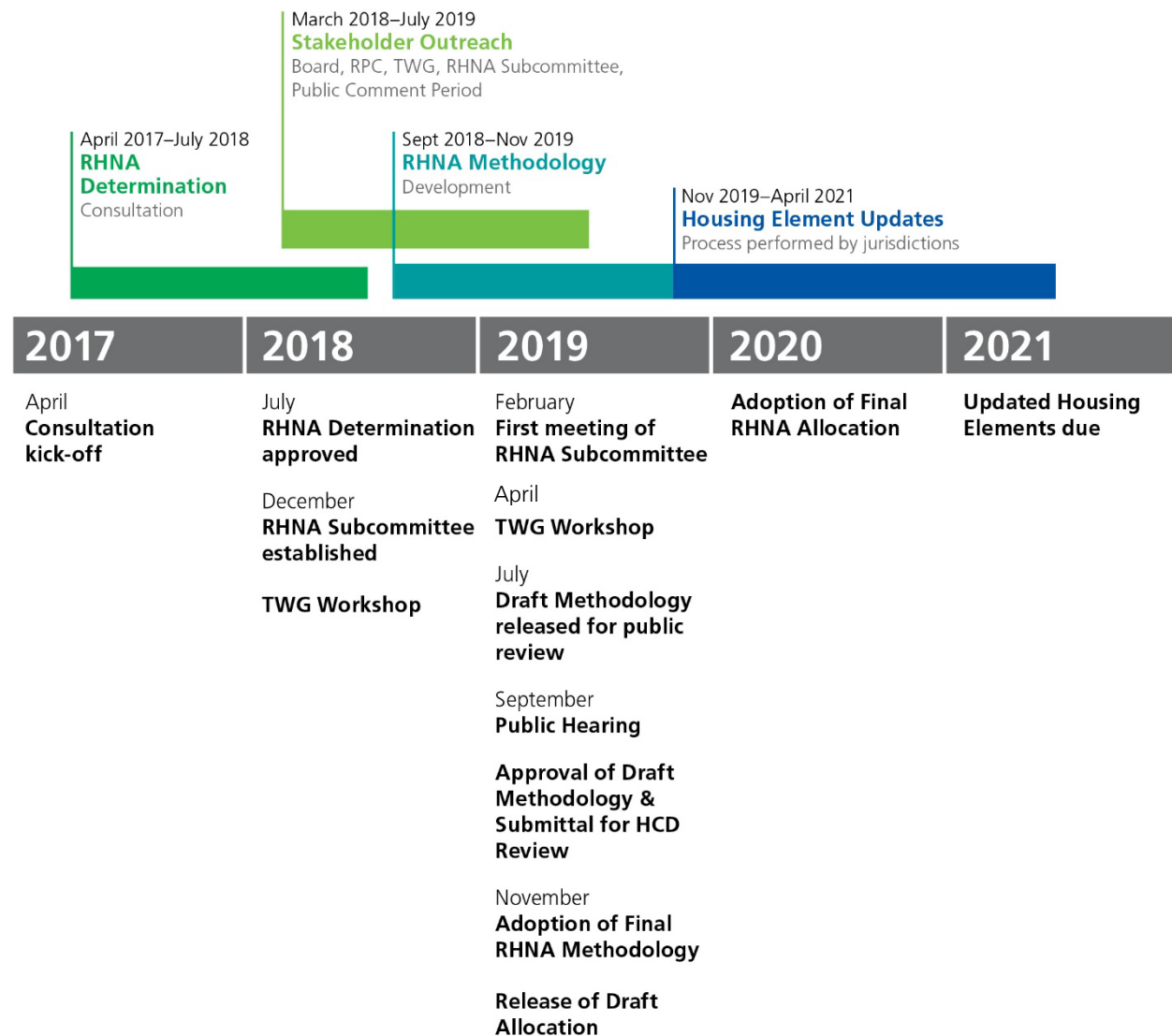
⁴ California Government Code Section 65584(d) and 65584.04(e)

Housing Element Update

Upon the adoption of the RHNA Plan and the allocation of housing units to each jurisdiction, state law requires local governments to update their housing elements to accommodate the housing unit allocation in the RHNA Plan. Housing elements are part of each jurisdiction’s [General Plan](#), which acts as a guide or blueprint for future development. Local governments adopt plans and regulatory systems in their housing elements to provide opportunities for private and non-profit developers to build housing to adequately address the needs of Californians.

Housing elements must be certified by HCD to ensure they are compliant with state law. Certification of housing elements for jurisdictions in the San Diego region must be accomplished by April 2021. For more information on housing elements, see HCD’s [Building Blocks: A Comprehensive Housing-Element Guide](#).

6th Cycle RHNA Process Timeline



3 SANDAG Oversight of the 6th Cycle RHNA Process

The methodology used to distribute the RHNA Determination housing units among the 19 jurisdictions in the San Diego region was developed through an iterative process, which included extensive stakeholder outreach. Feedback provided by stakeholders was used to establish an initial framework, select appropriate datasets, and refine the methodology.

This section provides an overview of stakeholder outreach, including decisions driving the inclusion of key components in the methodology, and technical information on specific datasets and calculations.

Stakeholder Outreach

Public participation involved facilitating discussion and soliciting input, data and recommendations from the Board, RHNA Subcommittee (a subcommittee of the Board), TWG, RPC (a policy advisory committee of the Board), and public stakeholders.

Board of Directors

Staff solicited input from the Board on an approach for the methodology beginning in September 2018. At its September 14, 2018, meeting, the Board was surveyed to determine each member jurisdiction’s priorities for the upcoming RHNA cycle, including which RHNA objectives and factors would be most important when determining the distribution of housing units in the region. The member jurisdictions requested that their initial set of priorities be further discussed by the TWG. The Board also directed the formation of the RHNA Subcommittee to review and provide input and guidance on potential policy and technical options for developing the methodology for allocation of housing units to each jurisdiction in the RHNA Plan.

Staff provided the Board with periodic updates on progress made by the RHNA Subcommittee as well as feedback received from other stakeholders. The Board received an update on the preliminary methodology in May 2019 and approved the release of the draft methodology for public comment at its July 26, 2019, meeting. The Board also conducted a public hearing for the RHNA Methodology on September 6, 2019, and adopted the final methodology on November 22, 2019, following HCD’s review.



Regional Housing Needs Assessment Subcommittee

The RHNA Subcommittee was formed by the Board in December 2018 and is tasked with developing a methodology and considering housing incentives following the adoption of the RHNA Plan. The RHNA Subcommittee is comprised of Board members from each SANDAG subregion to reflect the diversity of geography, jurisdiction size, and other attributes of member jurisdictions. To develop its recommendation to the Board, the RHNA Subcommittee explored options for how to build consensus around a methodology that complies with state law while best achieving the goals of the Board. The RHNA Subcommittee held six meetings between spring and summer 2019, prior to the Board’s release of the draft methodology. Critical direction provided by the RHNA Subcommittee included the following:

- Create a narrative around housing that promotes regional unity in addressing the housing need
- Establish a framework that incorporates transit and jobs to further the objective of increasing transit use, reducing VMT and GHG emissions, and relieving traffic congestion
- Include an equity adjustment to ensure the allocation furthers fair housing and increased affordability in all cities and the County of San Diego
- Evaluate opportunities for military installations within the region to provide housing for military and their families

Regional Housing Needs Assessment Subcommittee Members

Catherine Blakespear, Chair

Mayor, City of Encinitas
(Representing North County Coastal)

Mary Salas

Mayor, City of Chula Vista
(Representing Regional Planning Committee)

Monica Montgomery

Councilmember, City of San Diego

Jim Desmond

Supervisor, County of San Diego

Kristine Alessio

Councilmember, City of La Mesa
(Representing East County)

Rebecca Jones

Mayor, City of San Marcos
(Representing North County Inland)

Richard Bailey

Mayor, City of Coronado
(Representing South County)



Regional Planning Technical Working Group

The TWG is a SANDAG working group, which consists of the planning or community development director from each jurisdiction and representatives from other single-purpose regional agencies, such as the transit operators. The TWG advises the RPC and Board on the development and implementation of the Regional Plan, which includes the RHNA Plan. The TWG discussed and provided input on the development of the methodology at 11 meetings between December 2018 and June 2019, including two workshops specifically focused on RHNA.

Information on local government conditions provided by TWG members included:

- Preserved open space, agricultural lands, and airports and associated safety zones
- Universities and community colleges
- Military installations
- Low-wage jobs
- Voter requirements

Feedback provided by TWG members for which there was general consensus that was incorporated into the methodology included:

- Prioritizing transit, with greater weight given to major transit investments—rail and *Rapid* (R&R) stations—over local bus service
- Improving the job-housing relationship
- Encouraging the development of a mix of housing types across the region
- Addressing historical patterns of inequity in housing development

Regional Planning Committee

The RPC is one of the SANDAG Policy Advisory Committees, which provides oversight for the preparation and implementation of the Regional Plan. The RPC discussed the RHNA process at two of its meetings.

Information on local government conditions provided by RPC members included:

- Airport safety zones
- Housing development opportunities at major employment centers
- Sea level rise

Feedback received from the RPC which informed the development of the methodology included:

- Aligning priorities for the RHNA Methodology with priorities adopted by jurisdictions through other planning efforts such as climate action plans



Public

All meetings of the RHNA Subcommittee, TWG, RPC, and Board were open to the public. Representatives of many housing and land use stakeholder groups actively participated in RHNA discussions.

Notable stakeholder groups involved in discussions included the San Diego Housing Federation, Housing You Matters, Housing the Next 1 Million, San Diego Association of Realtors, and Circulate San Diego. The public also had the opportunity to provide input during the public comment period at the meetings described above.

Public Hearing and Comment Period

On July 26, 2019, the Board released a draft methodology for public review. SANDAG received over 2,000 written comments on the draft methodology from jurisdictions, organizations, and members of the public; all public comments, frequently asked questions, and responses to comments are posted online at sandag.org/rhna. In general, public comments requested the consideration or inclusion of the following in the methodology: population, geographic size, current density, available land, existing zoning, military housing, tribes, traffic congestion, parking, community character, transit service areas, market forces, jobs-housing ratio, public safety, and environmental concerns. The Board held a public hearing on September 6, 2019, where 31 members of the public provided verbal comments on the draft methodology. SANDAG also prepared a response to public comments, which was considered by the Board at the public hearing. After the public hearing, the Board concluded the public review period.

HCD Methodology Review

After consideration of the comments received, the Board authorized staff to submit the draft methodology to HCD for review. In a letter dated November 1, 2019, HCD notified SANDAG of its findings on the draft methodology (Appendix B).

HCD provided a brief summary of findings related to each RHNA objective in state law, finding that the methodology:

- Encouraged higher density planning in jurisdictions with more single-family homes, improving the mix of housing types
- Furthered infill and environmental principles, as the overall allocation is based on the location of jobs and transit access, noting that the methodology does not consider land capacity or vacant land as a determinant of RHNA, and instead focuses on where housing is needed to encourage transit ridership and reduced commutes
- Improved the relationship between low-wage jobs and low-income housing, provided an equitable share of housing units throughout the region, and affirmatively furthered fair housing



Appeals Period and Adoption of the Final RHNA Plan

On November 22, 2019, the Board adopted the final methodology and issued the draft allocation, which are incorporated in the following section of this report. Appendix C is the Board resolution adopting the final methodology. Pursuant to state law, jurisdictions and HCD were provided 45 days to submit appeals of the draft allocation. SANDAG received appeals from the cities of Coronado, Imperial Beach, Lemon Grove, and Solana Beach. At the conclusion of the appeal period, SANDAG distributed the four appeals to each jurisdiction and HCD, which began a second 45-day period for jurisdictions or HCD to provide comments on any or all appeals. SANDAG received five comment letters on the appeals: three from the City of Lemon Grove and one each from the cities of Coronado and Solana Beach. On June 26, 2020, the Board held a public hearing and voted to modify the City of Coronado's appeal, reject the appeals of the cities of Imperial Beach, Lemon Grove, and Solana Beach, and to issue the proposed final RHNA Plan. The final determinations, including written findings as to how each determination is consistent with state law, are located at sandag.org/rhna.



Based on the results of the appeals process, SANDAG adjusted the share of the regional housing needs allocated to the cities of Coronado, Imperial Beach, and San Diego. During a discussion with Naval Facilities Engineering Command Southwest in February 2020, it became clear that the jobs data for the Silver Strand Training Complex (SSTC) in the City of Coronado and the Naval Outlying Landing Field (NOLF) in the City of Imperial Beach was not aligned with the demographics report published by the Defense Manpower Data Center (DMDC) used to develop the SANDAG Employment Estimates. SSTC and NOLF have at most 99 active duty military jobs according to DMDC data. The total jobs data had erroneously treated both SSTC and NOLF as remote stations of Naval Base San Diego 32nd Street and redistributed a portion of the jobs at the 32nd Street installation located in the City of San Diego to SSTC and NOLF. To accurately reflect the DMDC report, the jobs previously assigned to these two installations are now properly attributed to the City of San Diego as part of the 32nd Street installation.

Additionally, Naval Air Station North Island (NASNI) jobs were reallocated based on the City of Coronado's appeal. Approximately 80.5% of the land area of NASNI is within the City of Coronado and 19.5% is within the City of San Diego. Therefore, the jobs at NASNI have been reassigned to each of the cities proportionate to the share of land area within each jurisdiction.

State law also provides a process for redistributing excess housing units resulting from any adjustments to the jurisdictions' allocations. However, there are no excess housing units to redistribute because the adjustments are based on a correction to the underlying data. Consistent with Government Code Section 65584.05(g), the RHNA Plan incorporates the results of the appeals process and fully allocates the regional share of the statewide housing need as determined by Government Code Section 65584.01.

On July 10, 2020, the Board approved Resolution 2021-02 (Appendix D), adopting the final RHNA Plan. Pursuant to Government Code Section 65584.05(g), the final RHNA Plan was submitted to HCD.

4 Methodology and Allocation

This section provides a detailed description of the methodology, including decisions driving the inclusion of key components in the methodology and technical information on specific datasets and calculations.

RHNA Methodology

The methodology was developed with input and recommendation from the Board, RHNA Subcommittee, TWG, RPC, and public stakeholders; several public meetings were held with each stakeholder group. Attendees at each meeting provided information regarding the types of data SANDAG should use, assumptions that should be made, as well as information regarding conditions in their individual jurisdictions that should be taken into consideration; jurisdictions and stakeholders also provided written comments during the process. Feedback provided by stakeholders was used to establish an initial framework, select appropriate datasets, and refine the methodology.

The consensus among participants was to develop an understandable methodology to engage the public in this critical regional conversation. Nuanced adjustments that may have modified the methodology in marginal ways in relation to the overall objectives and factors were discussed and considered. Factors and adjustments that would have created a complicated formula were not pursued since the methodology was developed with the intent to keep it transparent and understandable while also furthering the objectives and factors in state law.

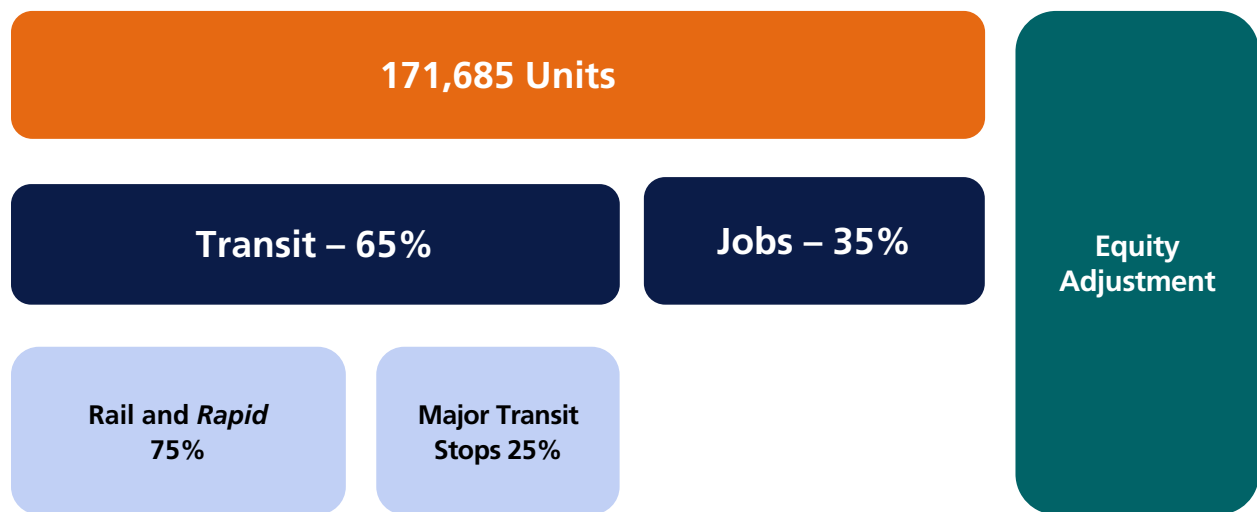
7



The final methodology adopted by the Board (Appendix C), depicted in Figure 4.1, includes the following components:

1. Of the total housing units, 65% will be allocated to jurisdictions with access to transit, including R&R stations and major transit stops. Significant investments in transit have been made throughout the region, and the methodology prioritizes housing growth in those areas with access to transit. Encouraging housing growth near transit can promote infill development (developing vacant or under-used land within existing urban areas that are already largely developed) and preserve open space, as most transit is located in urbanized areas. Improved access to transit can also lower the VMT in a car and reduce GHG emissions.
2. Within the housing units allocated for jurisdictions with access to transit, 75% of the units will be allocated to jurisdictions with R&R stations and 25% will be allocated to jurisdictions with major transit stops. To ensure future growth is located near transit, the methodology prioritizes 75% of the housing units in areas with R&R stations; which, are usually located along fixed routes that require significant capital investment to construct. Unlike bus stops or routes, R&R stations and routes are not amended or eliminated on a regular basis. The remaining 25% of the housing units will be allocated in jurisdictions with major transit stops, which as defined in state law⁵, have two intersecting bus routes that arrive at 15-minute intervals during peak commute hours.
3. Of the total housing units, 35% will be allocated to jurisdictions based on the total number of jobs within the jurisdiction. Jurisdictions should plan for housing to provide opportunities for more residents to live near their place of employment, promoting infill development and improving the intraregional relationship between jobs and housing.
4. The methodology further applies an equity adjustment. The RHNA Determination divided the number of housing units needed in the region into four income categories based on the region’s current percentages of households in each category. The equity adjustment includes a calculation of the existing households in each jurisdiction in each income category. To promote equity and fair housing, as well as to meaningfully address patterns of segregation, the methodology will allocate more housing units within each income category to jurisdictions with a percentage of households in that same category that is lower than the regional percentage.

Figure 4.1: RHNA Methodology



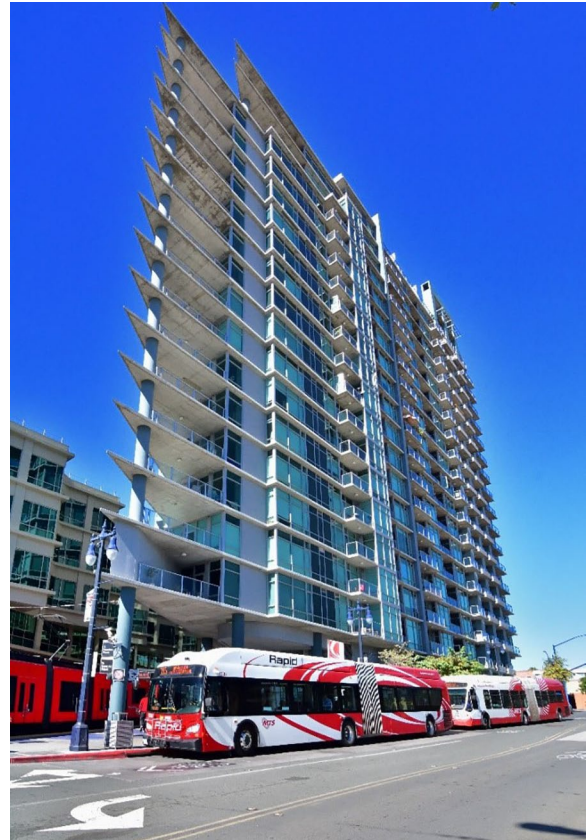
⁵ Public Resources Code Section 21064.3(c)

Transit

Of the total housing units, 65% (111,595 housing units) are allocated based on each jurisdiction's share of regional transit services. Because most transit infrastructure is located in the urbanized areas of the San Diego region, heavily weighting the transit component will promote infill development, preserve open space, and reduce VMT and GHG emissions.

The transit component measures each jurisdiction's share of R&R stations and major transit stops, which are defined below.

- R&R Stations: Stations served by rail (North County Transit District [NCTD] COASTER; NCTD SPRINTER; and Metropolitan Transit System [MTS] Trolley, including planned Mid-Coast stations), and *Rapid* routes (NCTD BREEZE route 350; MTS *Rapid* routes 215, 225, and 235; and MTS *Rapid* Express routes 280 and 290)
- 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 peak commute hours



Of the units allocated based on the transit component, 75% (83,696 housing units) are allocated based on each jurisdiction's share of R&R stations, while 25% (27,899 housing units) are allocated based on each jurisdiction's share of major transit stops. This reflects the significant investment the region has made to build and improve rail lines and *Rapid* routes as well as the permanency of rail lines relative to local bus service. Therefore, the methodology assumes these services can have a larger impact on commute behavior and achieving mode shift goals.

Data Source

The data source for the transit component is the SANDAG Activity-Based Model (ABM). For R&R stations, SANDAG ABM Forecast Year 2025 No Build was used in order to capture the Mid-Coast Trolley stations currently under construction and anticipated to be open for service to the public by 2021. For major transit stops, SANDAG ABM Forecast Year 2020 was used as the specific data source to align with the start of the sixth housing element cycle planning period.

For *Rapid* stations and major transit stops that have stops on either side of the road, which correspond to northbound/southbound or eastbound/westbound travel, stop pairs were counted as one station or stop. Stations that serve more than one rail and/or *Rapid* route were counted once in the R&R data. For example, the Oceanside Transit Center, which is served by two rail lines (NCTD COASTER and NCTD SPRINTER), accounts for only one of the seven R&R stations in Oceanside. Some R&R stations are also considered major transit stops because they are also served by two or more bus lines with 15-minute frequencies during peak commute. The Old Town Transit Center in the City of San Diego, for example, is both an R&R station (served by the NCTD COASTER and MTS Trolley) and a major transit stop (served by MTS Bus routes 10, 30, 35, and 44, which have 15-minute peak period frequencies).

The data underlying the proximity to transit component is included in Table 4.1 and shown on a map in Figure 4.2.

Table 4.1: Transit Data

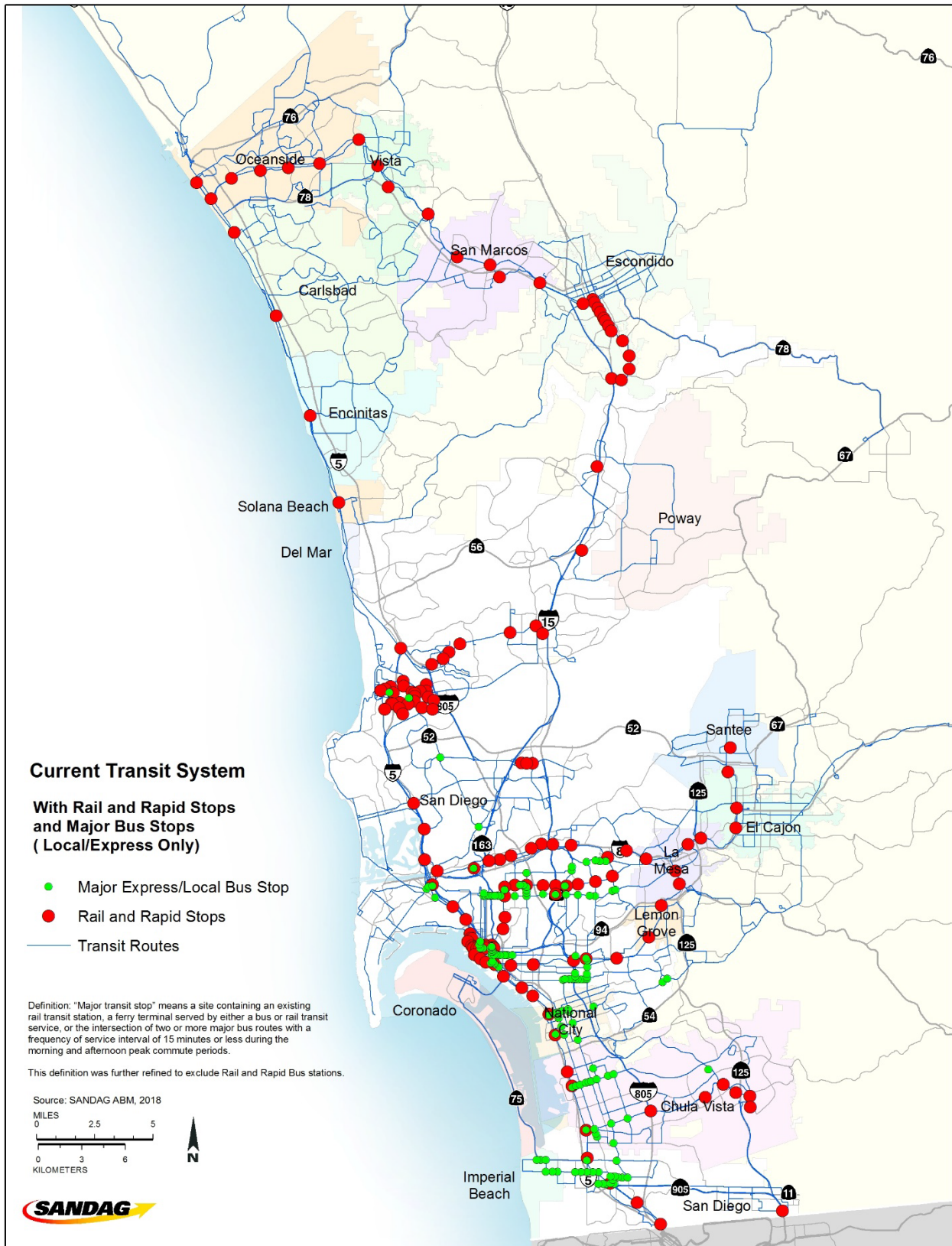
Jurisdiction	Rail & Rapid Stations		Major Transit Stops	
	Count	Regional Share (%)	Count	Regional Share (%)
Carlsbad	2	1.3%	0	0.0%
Chula Vista	9	5.8%	18	12.9%
Coronado	0	0.0%	0	0.0%
Del Mar	0	0.0%	0	0.0%
El Cajon	3	1.9%	0	0.0%
Encinitas	1	0.6%	0	0.0%
Escondido	14	9.1%	0	0.0%
Imperial Beach	0	0.0%	6	4.3%
La Mesa	5	3.2%	0	0.0%
Lemon Grove	2	1.3%	0	0.0%
National City	2	1.3%	15	10.7%
Oceanside	7	4.5%	0	0.0%
Poway	0	0.0%	0	0.0%
San Diego	100	64.9%	101	72.1%
San Marcos	3	1.9%	0	0.0%
Santee	1	0.6%	0	0.0%
Solana Beach	1	0.6%	0	0.0%
Unincorporated County	2	1.3%	0	0.0%
Vista	2	1.3%	0	0.0%
Region	154	100.0%	140	100.0%

Sources: *R&R Stations – SANDAG ABM, Forecast Year 2025 No Build*⁶;
*Major Transit Stops – SANDAG ABM, Forecast Year 2020*⁷

⁶ SANDAG ABM, Forecast Year 2025 No Build, Release v14.0.1, Reference Scenario #242, January 2019.

⁷ SANDAG ABM, Forecast Year 2020, Release v14.0.1, Reference Scenario #243, January 2019.

Figure 4.2: Transit Data



Jobs

Of the total housing units, 35% (60,090 units) are to be allocated based on each jurisdiction's share of jobs in the region.

Data Source

The data source for the jobs component is the SANDAG Employment Estimates, which are also being used to develop the latest Regional Growth Forecast. SANDAG Employment Estimates are derived from Quarterly Census of Employment and Wages (QCEW) data from the Economic Development Department (EDD) and the Longitudinal Employer-Household Dynamics Origin-Destination Employment Statistics (LODES) data from the Center for Economic Studies at the U.S. Census Bureau. The LODES data combines federal, state, and Census Bureau survey data on employers and employees; SANDAG uses the QCEW dataset for its detailed geographic information on businesses to geolocate "job spaces" throughout the region. Then LODES data (average of the last five years), which are available at the census block level, are used to fill the job spaces to determine total jobs within various geographies. SANDAG Employment Estimates are also supplemented by other data sources including the San Diego Military Advisory Council (SDMAC) and DMDC. Of note, SDMAC and DMDC assign jobs associated with a Navy ship to the installation that is the ship's homeport. Finally, the jobs data are validated against published job totals for the county from the EDD Labor Market Information's yearly data.

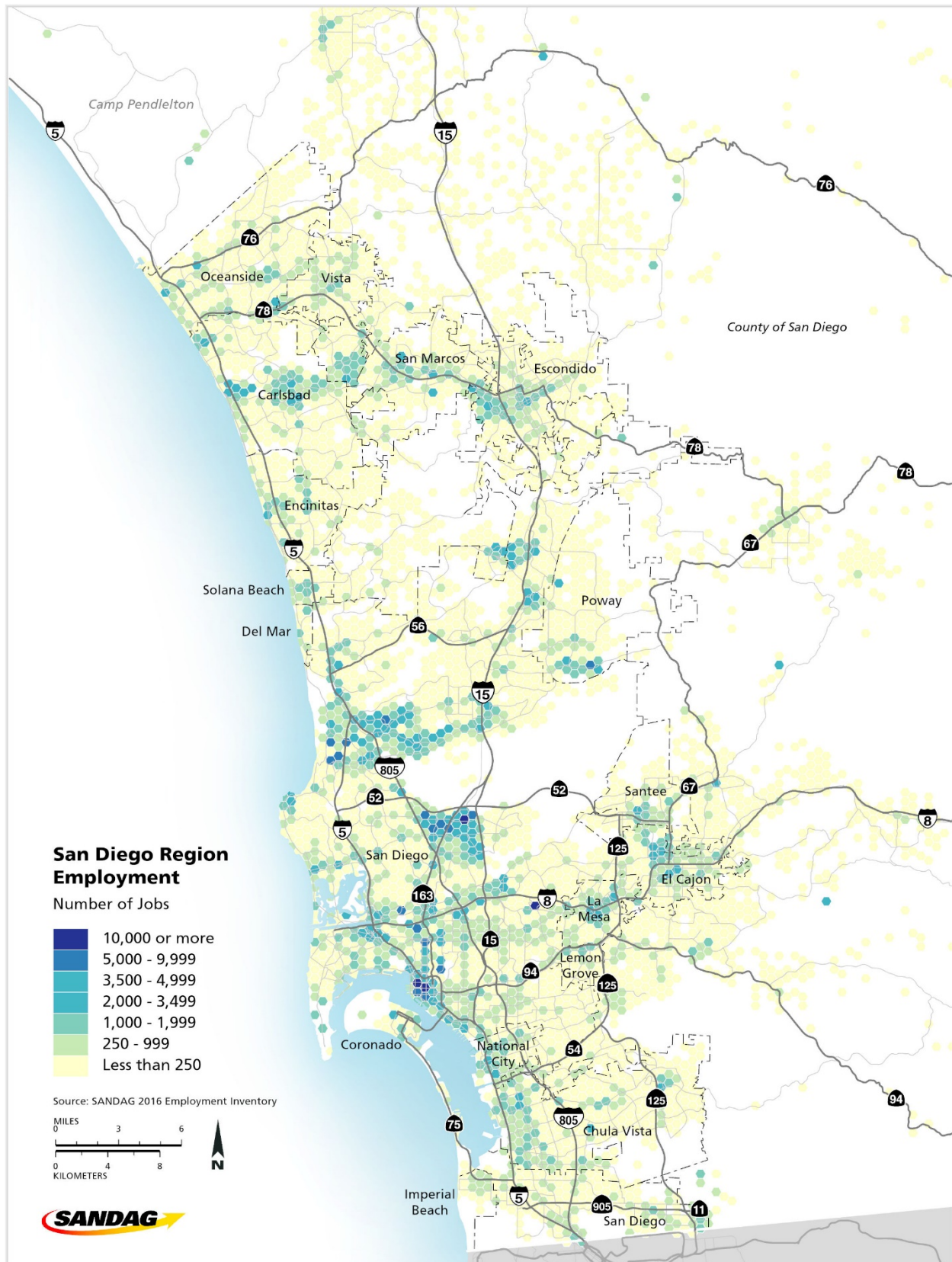
The jobs data consists of all job types and includes jobs that are classified as a primary source of income, which can be part-time or full-time, year-round or seasonal. The data underlying the jobs component is included in Table 4.2 and shown on a map in Figure 4.3.

Table 4.2: Jobs Data

Jurisdiction	Total Jobs	Regional Share (%)
Carlsbad	76,779	4.6%
Chula Vista	72,403	4.4%
Coronado	25,149	1.5%
Del Mar	4,484	0.3%
El Cajon	45,468	2.7%
Encinitas	27,871	1.7%
Escondido	55,059	3.3%
Imperial Beach	3,666	0.2%
La Mesa	29,773	1.8%
Lemon Grove	7,492	0.5%
National City	37,497	2.3%
Oceanside	45,178	2.7%
Poway	36,349	2.2%
San Diego	924,967	55.8%
San Marcos	40,964	2.5%
Santee	18,634	1.1%
Solana Beach	9,151	0.6%
Unincorporated County	154,686	9.3%
Vista	40,629	2.5%
Region	1,656,199	100.0%

Source: SANDAG Employment Estimates and/or SANDAG 2019 Regional Growth Forecast; U.S. Department of Defense

Figure 4.3: Jobs Data



Equity Adjustment

In addition to distributing the RHNA Determination among jurisdictions, SANDAG must distribute units for each jurisdiction among the four income categories defined by HCD. Each income category is defined as a range of household incomes that represents a percentage of the area median income (AMI). The AMI for a family of four in the San Diego region is \$66,529, as provided by HCD. Table 4.3 provides the definition for each income category and the income ranges for San Diego region households per category.

Table 4.3: Income Categories

Income Category	Definition	Income Range	Percent of Regional Households (RHNA Determination)
Very Low	Less than 50% of AMI	\$33,259 or less	24.7%
Low	50-80% of AMI	\$33,260 - \$53,219	15.5%
Moderate	80-120% of AMI	\$53,220 - \$79,829	17.3%
Above Moderate	Over 120% of AMI	\$79,830 or more	42.5%

Source: HCD Determination Letter; 2012-2016 American Community Survey 5-Year, DP03

Household income data was used to determine the number and share of households per income category in each jurisdiction, which is included in Table 4.4.

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, which is found by taking the inverse ratio of a jurisdiction's share of households within an income category to the region's share.



Table 4.4: Households per Income Category

Jurisdiction	Total Households	Existing Households by Income Category							
		Very Low	%	Low	%	Moderate	%	Above Moderate	%
Carlsbad	42,926	6,981	16.3%	4,644	10.8%	5,940	13.8%	25,360	59.1%
Chula Vista	77,804	19,459	25.0%	11,987	15.4%	13,643	17.5%	32,715	42.0%
Coronado	8,986	1,506	16.8%	1,109	12.3%	1,442	16.1%	4,929	54.9%
Del Mar	2,258	430	19.0%	102	4.5%	248	11.0%	1,478	65.5%
El Cajon	32,937	12,434	37.8%	5,754	17.5%	5,615	17.0%	9,135	27.7%
Encinitas	23,695	4,287	18.1%	2,168	9.2%	3,182	13.4%	14,058	59.3%
Escondido	45,217	13,880	30.7%	8,239	18.2%	8,245	18.2%	14,853	32.8%
Imperial Beach	9,044	2,888	31.9%	2,105	23.3%	1,726	19.1%	2,325	25.7%
La Mesa	23,767	6,368	26.8%	4,468	18.8%	4,609	19.4%	8,322	35.0%
Lemon Grove	8,465	2,316	27.4%	1,643	19.4%	1,730	20.4%	2,776	32.8%
National City	15,870	6,436	40.6%	3,271	20.6%	2,848	17.9%	3,315	20.9%
Oceanside	61,480	16,148	26.3%	11,348	18.5%	11,297	18.4%	22,687	36.9%
Poway	15,797	2,418	15.3%	1,675	10.6%	2,281	14.4%	9,422	59.6%
San Diego	490,219	119,014	24.3%	75,283	15.4%	82,616	16.9%	213,305	43.5%
San Marcos	29,125	7,707	26.5%	4,212	14.5%	5,043	17.3%	12,163	41.8%
Santee	19,517	3,493	17.9%	2,812	14.4%	3,683	18.9%	9,528	48.8%
Solana Beach	5,750	883	15.4%	698	12.1%	854	14.9%	3,315	57.7%
Unincorporated County	159,642	35,996	22.5%	26,493	16.6%	27,598	17.3%	69,555	43.6%
Vista	30,629	9,016	29.4%	5,746	18.8%	6,112	20.0%	9,754	31.8%
Region	1,103,128	271,661	24.6%	173,760	15.8%	188,713	17.1%	468,995	42.5%

Source: 2012-2016 American Community Survey (ACS) 5-Year, B19001 "Household Income in The Past 12 Months (In 2016 Inflation-Adjusted Dollars)"

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% for very-low-income) and uses this adjusted percentage as the jurisdiction’s share of its housing allocation for that income category. Table 3.5 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 equity adjustment increases a jurisdiction’s share of its housing allocation in an income category if its share of households within the category is smaller than the region. Conversely, the adjustment decreases a jurisdiction’s share of its housing allocation in an income category if its share of households within the category is greater 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 methodology is applied to the cities of Carlsbad and National City, chosen for comparison purposes.

Example A

In Carlsbad, 16.3% of households are very-low-income households, and in the region, 24.7% of households are very-low income; Carlsbad’s share of very-low-income households is less than the region. Using the equity adjustment in the methodology, Carlsbad receives a greater share (greater than 24.7%) of its housing unit allocation in the very-low-income category; 37.4% of Carlsbad’s total allocated housing units are in the very-low-income category.

Example B

Conversely, 40.6% of households in National City are very-low-income households; this is greater than the region’s 24.7% of very-low-income households. Therefore, based on the equity adjustment in the methodology, National City receives a smaller share (less than 24.7%) of its housing unit allocation in the very-low-income category; 15% of National City’s total allocated housing units are in the very-low-income category.

Data Source

SANDAG used data from the 2012-2016 ACS Five-Year, Table B19001 “Household Income in The Past 12 Months (In 2016 Inflation-Adjusted Dollars)” to determine the jurisdictions’ household breakdown among income categories. This dataset was also used by HCD to calculate the unit distribution across income category for the San Diego region’s RHNA Determination.



Table 4.5: Equity Adjustment Calculation

RHNA Determination	Very Low			24.7%	Low			15.5%	Moderate			17.3%	Above Moderate			42.5%
Jurisdiction	%	Scaling Factor		% Housing	%	Scaling Factor		% Housing	%	Scaling Factor		% Housing	%	Scaling Factor		% Housing
		Households	(↑ or ↓ adjustment)			Allocation	Households			(↑ or ↓ adjustment)	Allocation			Households	(↑ or ↓ adjustment)	
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%

Final RHNA Allocation

Based on the methodology as described above, the total allocation per jurisdiction is included in Table 4.6 and each jurisdiction's allocation per income category is included in Table 4.7.

Table 4.6: Total Allocation

Jurisdiction	Transit Weighting: 65%	Jobs Weighting: 35%	Total Allocation
Carlsbad	1,087	2,786	3,873
Chula Vista	8,478	2,627	11,105
Coronado	-	912	912
Del Mar	-	163	163
El Cajon	1,630	1,650	3,280
Encinitas	543	1,011	1,554
Escondido	7,609	1,998	9,607
Imperial Beach	1,196	133	1,329
La Mesa	2,717	1,080	3,797
Lemon Grove	1,087	272	1,359
National City	4,076	1,361	5,437
Oceanside	3,804	1,639	5,443
Poway	-	1,319	1,319
San Diego	74,478	33,558	108,036
San Marcos	1,630	1,486	3,116
Santee	543	676	1,219
Solana Beach	543	332	875
Unincorporated County	1,087	5,613	6,700
Vista	1,087	1,474	2,561
Region (Totals)	111,595	60,090	171,685

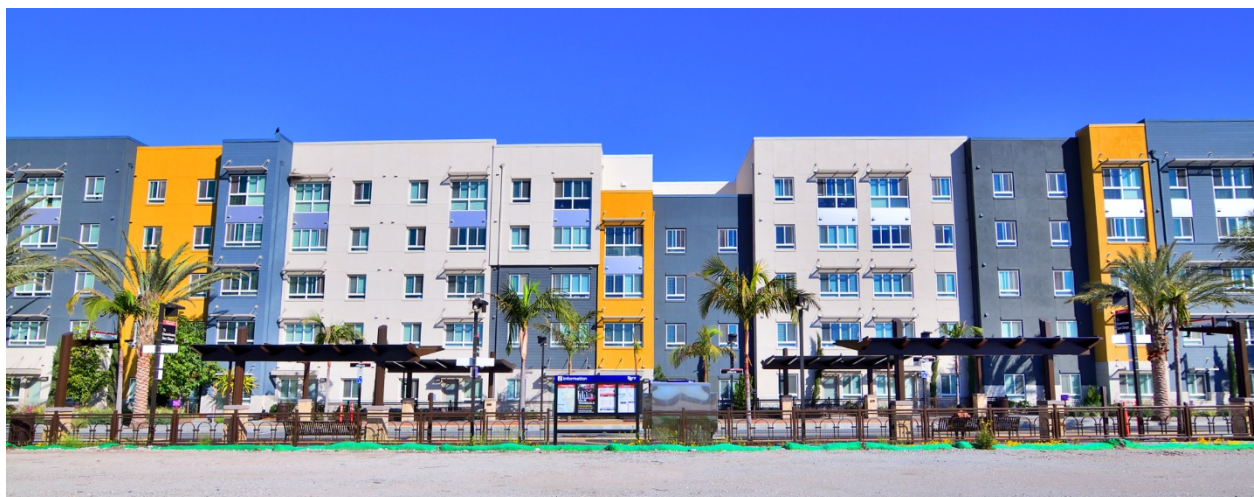


Table 4.7: Allocation per Income Category

Jurisdiction	Very Low	Low	Moderate	Above Moderate	Total Allocation
Carlsbad	1,311	784	749	1,029	3,873
Chula Vista	2,750	1,777	1,911	4,667	11,105
Coronado	312	169	159	272	912
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	225	123	183	798	1,329
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	27,549	17,331	19,319	43,837	108,036
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



5 Objectives and Factors

Objectives

The methodology and allocation described in the RHNA Plan further the five objectives listed in Government Code Section 65584.

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.*

Per state law, the methodology allocates units in all four income categories to each of the region's 19 jurisdictions. The methodology does so equitably, ensuring each jurisdiction receives an allocation for low- and very-low-income units, and further, allocating a higher share of low- and very-low income units to jurisdictions that currently have a smaller share of low- and very-low-income households than the regional share. State law requires jurisdictions to zone at higher densities to accommodate its low- and very-low-income housing allocation. As jurisdictions plan for and build housing, the mix of housing types will increase.

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 GHG reductions targets provided by the California Air Resources Board (ARB) pursuant to Section 65080.*

The methodology prioritizes transit and jobs to encourage efficient development patterns and reduce GHG emissions. By allocating housing units based on these two factors, SANDAG sets a guiding principle for local jurisdictions to zone and build housing near transit and job centers, which are located in the urbanized areas of the region. Therefore, an allocation based on transit and jobs will lead to more infill development while protecting natural resources and open space; because infill development can occur on under-used land, the methodology supports provision of housing even in areas that are currently considered built-out.



SANDAG's GHG reduction target, as set by the ARB, is to reduce by 15% the region's per capita emissions of GHGs from cars and light trucks by 2020, compared with a 2005 baseline. By 2035, the target is to reduce GHG emissions by 19% per capita. The methodology encourages the development of housing near jobs and transit, which will provide the region's residents with opportunities to live where they work and/or readily access transit, which can facilitate shorter commutes, reduce VMT, and increase trip-taking by transit or alternative modes.

Additionally, placing residents near jobs and transit is consistent with the ARB's identified policy goals and guidance detailed in the [2017 Climate Change Scoping Plan](#), which proposes to strengthen major programs related to climate impacts and further integrate efforts to reduce both GHG emissions and air pollution. Among the ARB's Vibrant Communities and Landscapes / VMT Reduction Goals identified to reduce GHG emissions from the transportation sector are the following:

- Promote all feasible policies to reduce VMT, including:
 - Land use and community design that reduce VMT
 - Transit oriented development
 - Complete street design policies that prioritize transit, biking, and walking
 - Increasing low carbon mobility choices, including improved access to viable and affordable public transportation and active transportation opportunities
 - Increase the number, safety, connectivity, and attractiveness of biking and walking facilities to increase use
 - Promote shared-use mobility, such as bike sharing, car sharing and ride-sourcing services to bridge the "first mile, last mile" gap between commuters' transit stops and their destinations
 - Continue research and development on transportation system infrastructure, including:
 - Integrate frameworks for lifecycle analysis of GHG emissions with life-cycle costs for pavement and large infrastructure projects
 - Health benefits and costs savings from shifting from driving to walking, bicycling, and transit use
 - Quadruple the proportion of trips taken by foot by 2030 (from a baseline of the 2010–2012 California Household Travel Survey)
 - Strive for a nine-fold increase in the proportion of bike trips by 2030 (from a baseline of the 2010–2012 California Household Travel Survey)
 - Strive, in passenger rail hubs, for a transit mode share of between 10% and 50%, and for a walk and bike mode share of between 10% and 15% (Scoping Plan, p.76)
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.*

SANDAG conducted an analysis of the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction. The analysis shows that the number of low-wage jobs far exceeds the number of existing housing units affordable to low-wage workers in each jurisdiction.

The methodology allocates 35% of the 171,685-unit regional housing need based on each jurisdiction's share of existing regional total jobs to encourage development of housing near job centers so that jurisdictions can improve the jobs-housing relationship.

Furthermore, the methodology's Equity Adjustment (see Objective 4) improves the balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction by allocating a higher share of low- and very-low-income housing units to jurisdictions that currently have a smaller share of low- and very-low-income households than the regional share.

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 ACS.*



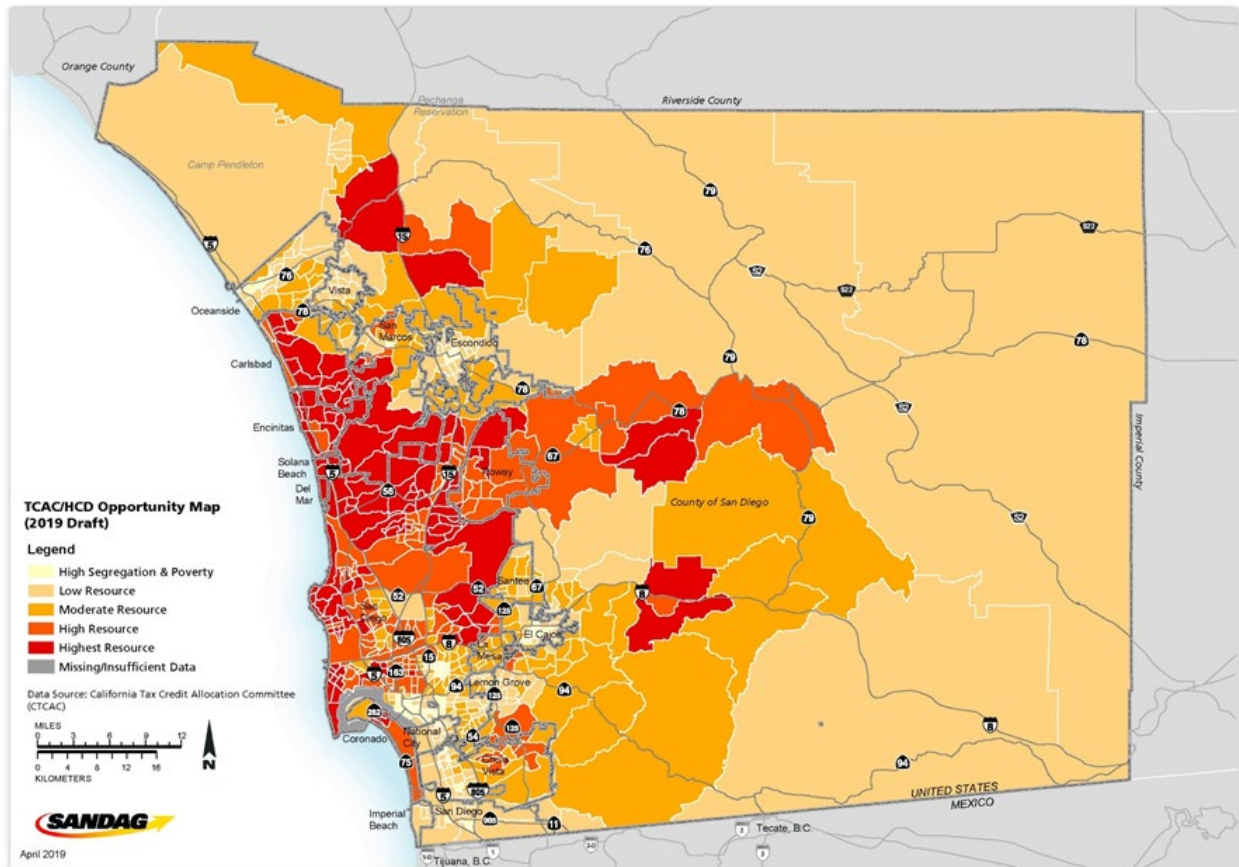
This objective guided the development of the Equity Adjustment used to ensure the methodology will result in allocation of housing units to each of the income categories. This adjustment results in a jurisdiction receiving a lower proportion of its total housing units within an income category when it has a higher share of households within that income category compared to the region. This method shifts units across income categories, rather than adding units to a jurisdiction's total housing unit allocation, allowing for a mix of housing types and affordability near transit and jobs.

5. *Affirmatively furthering fair housing. For purposes of this section, "affirmatively furthering fair housing" means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.*

During development of the methodology, SANDAG reviewed the California Tax Credit Allocation Committee (TCAC) 2019 Opportunity Map for the San Diego region included in Figure 5.1. The TCAC map demonstrates how public and private resources are spatially distributed within the region. The map is part of a larger study that shows how communities with better air quality, higher educational attainment, and better economic indicators are communities that have higher "opportunity", or pathways that offer low-income children and adults the best chance at economic advancement. The study finds that historically communities with higher opportunity – through plans, policies, and practices – may have systematically denied equal opportunity to low socioeconomic and minority populations.

Areas of "low resource" and "high segregation and poverty" on the TCAC maps are also many of the same areas with a high concentration of low-income households in the San Diego region. The Equity Adjustment within the methodology addresses the disparities in access to resource-rich areas by providing housing opportunities for people in all income levels to reside in any given community. This is meant to foster and maintain compliance with civil rights and fair housing laws. The Equity Adjustment in the methodology assists in overcoming patterns of discrimination and transforming racially and ethnically concentrated areas of poverty into areas of opportunity by allocating a higher proportion of low-income housing units to jurisdictions with a lower share of low-income households, which tend to be jurisdictions with a high concentration of resource-rich areas.

Figure 5.1 California Tax Credit Allocation Committee Opportunity Map



Factors

In addition to furthering the objectives outlined above, state law requires that consideration of several factors be included in the development of the methodology, to the extent sufficient data is available pertaining to each factor. See Government Code Section 65584.04(e). The RHNA factors and how consideration of each was included in the development of the methodology are described below.

1. *Each 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 methodology prioritizes jobs as a factor in allocating the regional housing need. The jobs factor seeks to encourage development of housing near job centers so that jurisdictions can achieve greater jobs-housing balance. The jobs factor uses current data on existing jobs instead of a projection. Given the housing shortage within the region, it is critical that housing is built where existing jobs are located to begin to address the current jobs-housing imbalance. Although data for projected job and household growth by income level for the next Regional Plan update is not yet available, SANDAG used the most recent readily available data for projected job growth and projected household growth by income level within each member jurisdiction to conduct its analysis.

SANDAG analyzed the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction. The analysis showed that the number of low-wage jobs far exceeds the number of existing housing units affordable to low-wage workers in each jurisdiction.

The methodology is expected to increase the supply of affordable housing by allocating each jurisdiction low- and very-low-income housing units. The methodology's Equity Adjustment (see Objective 4) should also improve the balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction by allocating a higher share of low- and very-low-income housing units to jurisdictions that currently have a smaller share of low- and very-low-income households than the regional share.

2. *The opportunities and constraints to development of additional housing in each member jurisdiction, including all of the following:*

- 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.*

SANDAG notes that general plans for some jurisdictions may account for constraints to housing development arising from lack of capacity for sewer or water service. For example, rural areas may rely more heavily on well water and septic systems, which constrains housing development due to lack of sufficient infrastructure. For the methodology; however, the transit factor allocates housing units based on each jurisdiction's share of regional R&R stations as well as major transit stops. R&R stations are located in the region's more developed areas where land uses generate enough ridership to support the investment to the transit infrastructure. Major transit stops are also located in the region's urbanized areas and surrounded by land uses that support higher service frequencies. By prioritizing transit connectivity, the methodology encourages infill development in urban areas that are likely to have existing capacity for sewer or water service.

- 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 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 methodology is not constrained by existing zoning ordinances and land use restrictions. Instead the methodology prioritizes transit and jobs, which aligns with several beneficial land use planning principles, such as promoting infill and increasing residential densities. 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 are accounted for in the methodology's jobs and transit factors. When development of housing is promoted near transit and jobs, it allows the jurisdictions to focus on infill development that can occur on underutilized land that can be converted to uses that allow for increased residential density.

The transit factor allocates housing units based on each jurisdiction's share of regional R&R stations as well as major transit stops. R&R stations are located in the region's urbanized areas where land uses generate enough ridership to support the investment to the transit infrastructure. Major transit stops are also located in the region's urbanized areas and surrounded by land uses that support higher service frequencies. By prioritizing transit, the methodology encourages infill development in areas that are suitable for urban development. A transit-focused methodology also promotes increased densities as jurisdictions plan for housing in urban areas already served by high quality transit.



The methodology aligns with the region's priorities for growth. As shown in Figure 5.2, general plans in the San Diego region have focused growth and development in existing urban areas, preserved more land for habitat and open space, and looked to accommodate more housing near transit and key destinations.

- 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 non-agricultural uses.*

General plans for individual jurisdictions may account for constraints to housing development arising from lands preserved or protected from urban development under existing federal or state programs. However, as shown in Figures 5.3 and 5.4, preserved land, farmland, and habitats are primarily in the eastern portion of San Diego County. The methodology focuses housing units in areas with access to transit and jobs, which are located in existing urbanized areas. Therefore, the methodology will not encourage encroachment upon lands preserved or protected under types of federal, state or local programs described above.

- d. *County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area and land within an unincorporated area 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 its conversion to non-agricultural uses.*

The County of San Diego General Plan accounts for some constraints to housing development arising from policies to preserve prime agricultural land and incorporates local ballot measure provisions prohibiting or restricting the conversion of agricultural to non-agricultural uses. The methodology allocates housing units based on access to jobs and transit, which are located in existing urbanized areas. Therefore, this constraint is not expected to impact the methodology's capacity to allow for development of additional housing.

Figure 5.2: Priorities for Growth Then and Now

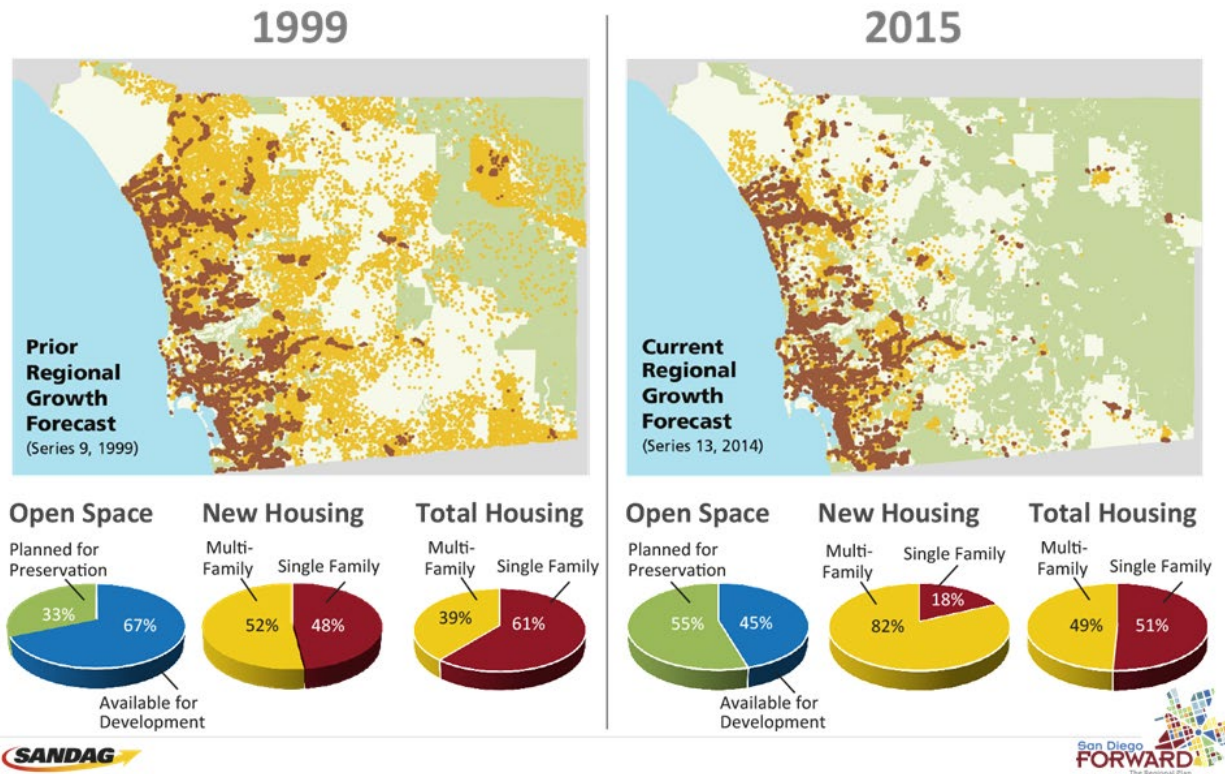


Figure 5.3 San Diego Regional Habitat Preserved Lands

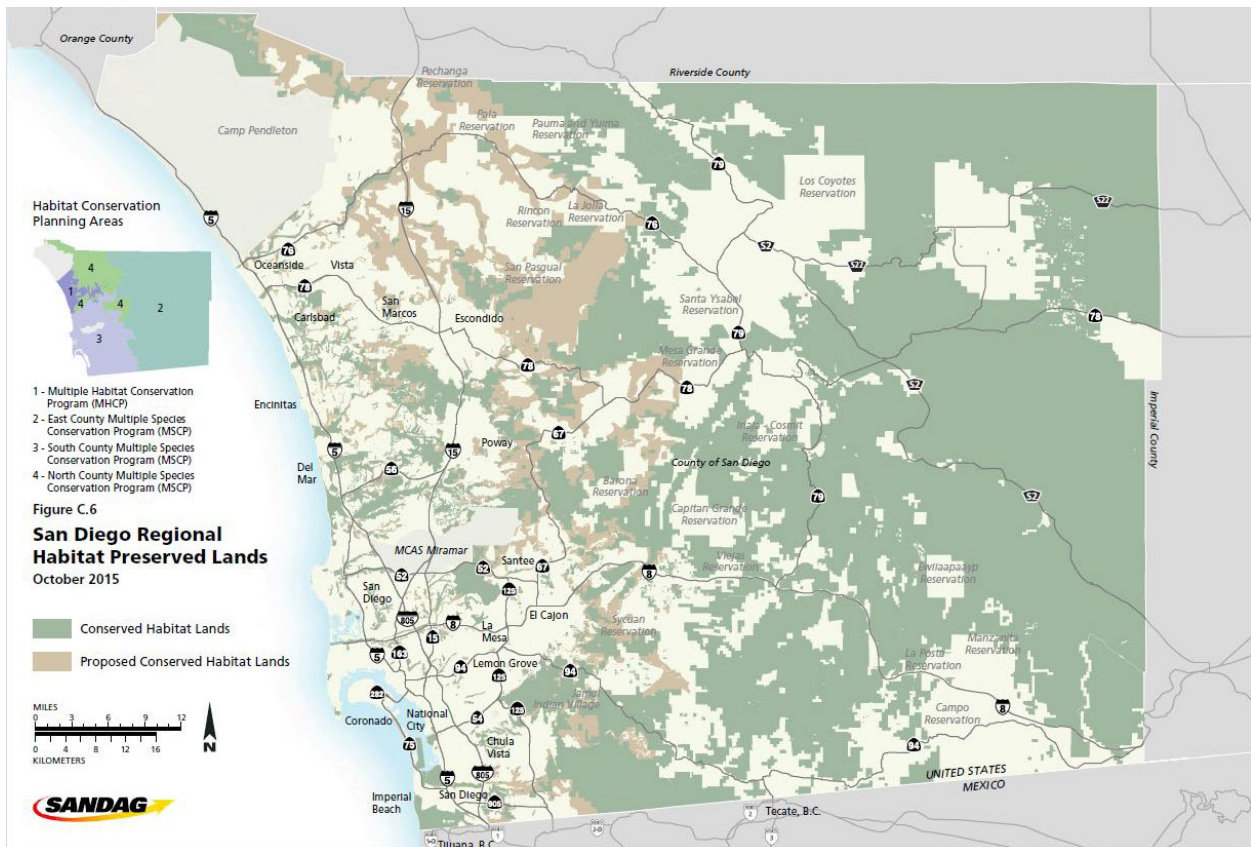
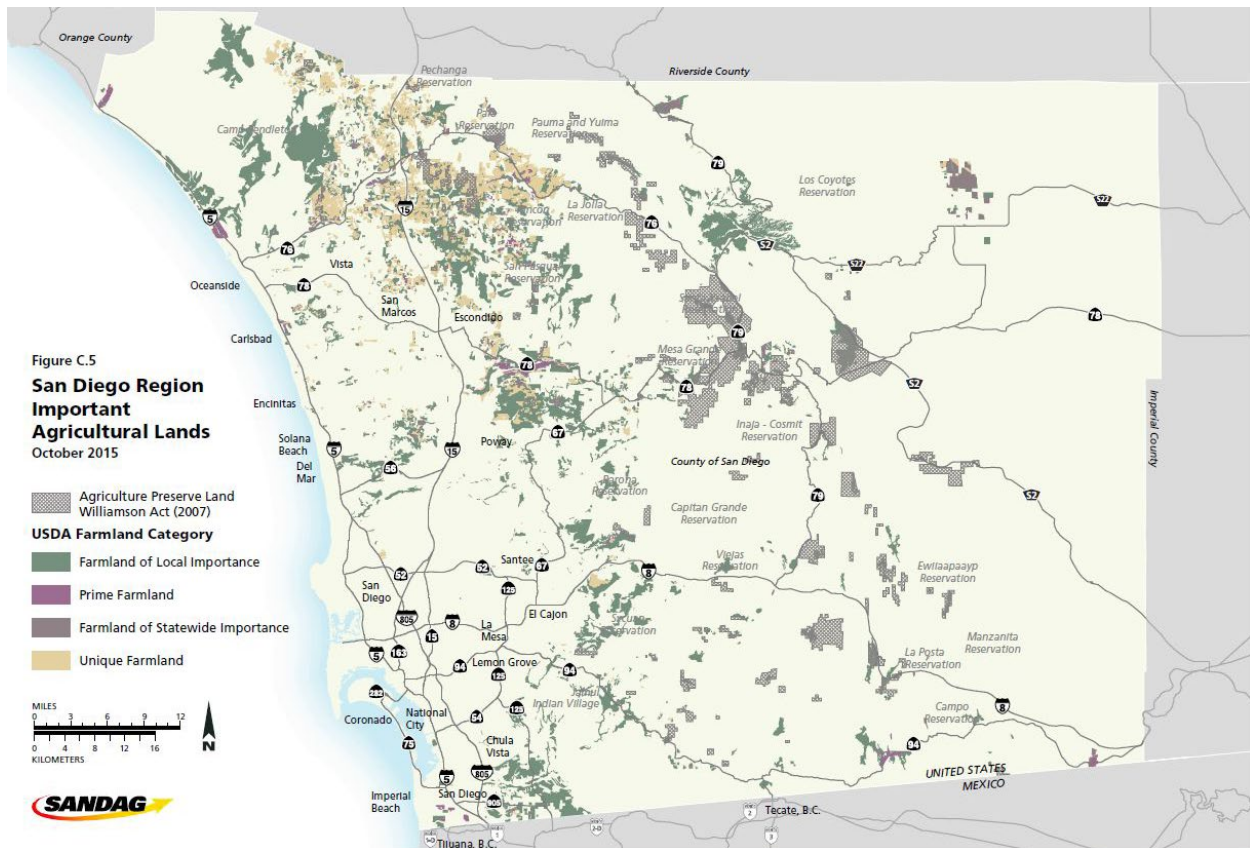


Figure 5.4 San Diego Region Important Agricultural Lands



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 shown in Figure 5.2, plans for growth are focused on the urbanized areas of the region. The methodology prioritizes transit as a factor – specifically high-quality transit, which is located in the urbanized area. The emphasis on transit allows local jurisdictions that have invested in transit the opportunity to maximize the use of existing transportation infrastructure.

4. *Agreements between a county and cities in a county to direct growth toward incorporated areas of the county, and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of the jurisdiction that prohibits or restricts conversion to non-agricultural uses.*

Regional planning undertaken by SANDAG and its member agencies during the past 15 to 20 years, has focused the region’s growth in the western third of the region, primarily in its incorporated cities and near transit service (Figure 5.2). SANDAG has funded “smart growth” grants to encourage growth in incorporated areas of the county with sufficient density to support transit-oriented development. Consistent with this, the methodology prioritizes transit and jobs. High-quality transit service and a high concentration of the region’s jobs are located in the urbanized, incorporated areas of the region. Thus, the methodology is consistent with agreements between SANDAG, the County of San Diego, and the cities to develop public transportation infrastructure and supporting land uses away from areas that are zoned or designated for agricultural protection or preservation. Interjurisdictional agreements may account for some development constraints; however, those agreements are not expected to be in conflict with the methodology due to the prioritization of transit and jobs.

5. *The loss of units contained in assisted housing developments, as defined in paragraph (9) of subdivision (a) of Section 65583, that changed to non-low income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions.*

The data for these units is not readily available and varies by jurisdiction. The loss of assisted housing developments for lower-income households is an issue that would be addressed by the jurisdictions when preparing their housing elements.

6. *The percentage of existing households at each of the income levels listed in subdivision (e) of Section 65584 that are paying more than 30% and more than 50% of their income in rent.*

This factor was not included in state law at the time HCD was making its determination on the regional housing need of the San Diego region, and sufficient data for this factor is not readily available. The San Diego region received its largest RHNA Determination this cycle, and it is expected that an influx of housing units in each income category will help alleviate the rent burden in the region.

7. *The rate of overcrowding.*

HCD used the 2012-2016 ACS to determine the rate of overcrowding in the San Diego region when making its RHNA Determination. HCD then compared the San Diego region's overcrowding rate (6.43% of all households) to the national rate (3.34% of all households). To address the needs of overcrowding in the region, HCD's RHNA Determination included an overcrowding adjustment of 3.09%, which added 38,700 housing units to the regional housing need to alleviate overcrowding in the region. Therefore, this factor has already been accounted for in the methodology.

8. *The housing needs of farmworkers.*

The methodology prioritizes jobs as a factor in allocating the regional housing need. Farmworker jobs are included in the data on existing jobs by jurisdiction. Therefore, their housing needs along with the housing needs of all the region's workers are considered.

The methodology increases the supply of affordable housing by allocating each jurisdiction low- and very-low-income housing units. The methodology's Equity Adjustment (see Objective 4) also improves the balance between the number of low-wage jobs, including farming jobs, and the number of housing units affordable to low-wage workers in each jurisdiction by allocating a higher share of low- and very-low-income housing units to jurisdictions that currently have a smaller share of low- and very-low-income households than the regional share. The allocation is expected to provide more low-income housing in every jurisdiction and accordingly would provide farmworkers the ability to live in more areas of the region and commute shorter distances to their seasonal jobs.

9. *The housing needs generated by the presence of a private university or a campus of the California State University or the University of California within any member jurisdiction.*

The major universities and community colleges in the San Diego region are located in urban areas served by the existing transportation network. The City of San Diego is home to San Diego State University; UC San Diego; University of San Diego; Point Loma Nazarene University; various smaller, private universities; and three community colleges: San Diego City College, San Diego Mesa College, and San Diego Miramar College. It also has the greatest share of the region's transportation system in part because of transportation investments near universities and colleges located within its jurisdiction.



Similarly, the cities of Chula Vista (Southwestern Community College), El Cajon (Cuyamaca College), Oceanside (Mira Costa College), and San Marcos (California State University San Marcos and Palomar College) have made transportation investments to improve access to transit near colleges and universities. By prioritizing transit, the methodology encourages housing development near existing transit and the key destinations that transit links, including the region's universities and colleges. The methodology will result in additional housing units being allocated based on transit to assist these jurisdictions address the housing needs of students, faculty, and staff beyond what these colleges or universities may provide.

10. *The housing needs of individuals and families experiencing homelessness. If a council of governments has surveyed each of its member jurisdictions pursuant to subdivision (b) on or before January 1, 2020, this paragraph shall apply only to the development of methodologies for the seventh and subsequent revisions of the housing element.*

SANDAG conducted stakeholder outreach, including surveying member jurisdictions, beginning in September 2018. Therefore, this factor is not applicable for the development of the methodology for the sixth cycle revision of the housing element.

11. *The loss of units during a state of emergency that was declared by the Governor pursuant to the California Emergency Services Act (Chapter 7 (commencing with Section 8550) of Division 1 of Title 2), during the planning period immediately preceding the relevant revision pursuant to Section 65588 that have yet to be rebuilt or replaced at the time of the analysis.*

Jurisdictions report demolished units to the DOF on an annual basis. Demolished units include those lost during a state of emergency. Between 2011 and 2018, states of emergency in the San Diego region declared by the Governor pursuant to the California Emergency Services Act, and in which homes were lost, include the following wildfires: the 2014 wildfires (Cocos Fire and Poinsettia Fire), 2017 Lilac Fire, and 2018 West Fire.

HCD analyzed the most recent ten-year average rate of demolition within the San Diego region based on jurisdictions' annual reports to the DOF. The ten-year average rate of demolition in the San Diego region is 0.32% of the total housing stock. The RHNA Determination included HCD's minimum replacement adjustment of 0.5%, which exceeds the region's demolition rate. This adjustment added 6,255 housing units to the RHNA Determination. SANDAG does not have readily available data broken down by jurisdiction to use for this factor and has therefore relied on HCD's data and adjustment to address this factor at a regional level.

12. *The region's GHG emissions targets provided by the ARB pursuant to Section 65080.*

SANDAG's GHG reduction target, as set by the ARB, is to reduce by 15% the region's per capita emissions of GHG from cars and light trucks by 2020, compared with a 2005 baseline. By 2035, the target is to reduce GHG emissions by 19% per capita. The methodology encourages the development of housing near jobs and transit, which will provide the region's residents with opportunities to live where they work and/or readily access transit, which can facilitate shorter commutes, reduce GHG emissions, and increase trip-taking by transit or alternative modes.

13. *Any other factors adopted by the council of governments, that further the objectives listed in subdivision (d) of Section 65584, provided that the council of governments specifies which of the objectives each additional factor is necessary to further. The council of governments may include additional factors unrelated to furthering the objectives listed in subdivision (d) of Section 65584 so long as the additional factors do not undermine the objectives listed in subdivision (d) of Section 65584 and are applied equally across all household income levels as described in subdivision (f) of Section 65584 and the council of governments makes a finding that the factor is necessary to address significant health and safety conditions.*

No other factors were included in the methodology.

6 What's Next

In order to achieve the benefits of housing near transit and jobs, implementation of the RHNA Plan will be key. To get started, each jurisdiction will update the housing element in its general plan to accommodate the RHNA Plan Allocation. Permitting and constructing more housing units during the housing element cycle will take efforts from all levels of government, housing developers, non-profit organizations, and the public. In coordination with the development of San Diego Forward: The 2021 Regional Plan, SANDAG will embark on developing a housing incentive program, which will support jurisdictions in the development and adoption of policies and process improvements to accelerate housing production. The program will also look for ways to leverage funding from the State of California to provide more housing in the region and meet the goals of the Regional Plan.



Appendix A – Final RHNA Determination

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



July 5, 2018

Kim Kawada
Chief Deputy Executive Director
San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101-4231

Dear Kim Kawada:

RE: Final Regional Housing Need Determination

This letter provides the San Diego Association of Governments (SANDAG) its Final Regional Housing Need Determination. Pursuant to state housing element law (Government Code (Gov. Code) section 65584, et seq.), the Department of Housing and Community Development (Department) is required to provide the determination of SANDAG's existing and projected housing need.

In assessing SANDAG's regional housing need, the Department and SANDAG staff completed an extensive consultation process from October 2016 through June 2018 covering the Department's methodology, data sources, and timeline for both the Department's Regional Housing Need Determination and SANDAG's Regional Housing Need Allocation (RHNA). The Department also consulted with Walter Schwarm of the California Department of Finance (DOF) Demographic Research Unit.

Attachment 1 displays the minimum regional housing need determination of **171,685** total units among four income categories for SANDAG to distribute among its local governments. Attachment 2 explains the methodology applied pursuant to Gov. Code section 65584.01. In determining SANDAG's housing need, the Department considered all the information specified in state housing law (Gov. Code section 65584.01(c)).

As you know, SANDAG is responsible for adopting a methodology and RHNA Plan for the *projection* period beginning June 2020 and ending April 2029. Within 30 days from the adoption date, SANDAG must submit the RHNA Plan to the Department for approval. Local governments are in turn responsible for updating their housing element for the *planning* period beginning April 2021 and ending April 2029 to accommodate their share of new housing need for each income category.

Pursuant to Gov. Code section 65584(d), the methodology to prepare SANDAG's RHNA plan must be consistent with the following objectives:

- (1) Increasing the housing supply and mix of housing types, tenure, and affordability
- (2) Promoting infill development and socioeconomic equity, protecting environmental and agricultural resources, and encouraging efficient development patterns
- (3) Promoting an improved intraregional relationship between jobs and housing
- (4) Balancing disproportionate household income distributions

Pursuant to Gov. Code section 65584.04(d), to the extent data is available, SANDAG should include the factors listed in Gov. Code section 65584.04(d)(1-10) to develop its RHNA plan, and pursuant to Gov. Code section 65584.04(e), SANDAG must explain in writing how each of these factors was incorporated into the RHNA plan methodology.

The Department commends SANDAG for its leadership in fulfilling its important role in advancing the state's housing, transportation, and environmental goals. SANDAG is also recognized for its actions in proactively educating and engaging its board and subcommittees on the RHNA process and the regional housing need, as well as encouraging regional collaboration on best practices around housing and land use. The Department especially thanks Seth Litchney, Coleen Clementson, Carolina Ilic, Rachel Cortes, Dmitry Messen, Muggs Stoll, Daniel Flyte, and Kim Kawada for their significant efforts and assistance. The Department looks forward to its continued partnership with SANDAG and its member jurisdictions and assisting SANDAG in its planning efforts to accommodate the region's share of housing need.

If the Department can provide any additional assistance, or if you, or your staff, have any questions, please contact Megan Kirkeby, Assistant Deputy Director for Fair Housing, at (916) 263-7428 or megan.kirkeby@hcd.ca.gov.

Sincerely,



Zachary Olmstead
Deputy Director

Enclosures

ATTACHMENT 1

HCD REGIONAL HOUSING NEED DETERMINATION

San Diego County Governments: June 30, 2020 through April 15, 2029

<u>Income Category</u>	<u>Percent</u>	<u>Housing Unit Need</u>
Very-Low*	24.7%	42,332
Low	15.5%	26,627
Moderate	17.3%	29,734
Above-Moderate	42.5%	72,992
Total	100.0%	171,685
* Extremely-Low	13.6%	Included in Very-Low Category

Notes:

Income Distribution:

Income categories are prescribed by California Health and Safety Code (Section 50093, et. seq.). Percents are derived based on Census/ACS reported household income brackets and County median income.

ATTACHMENT 2

HCD REGIONAL HOUSING NEED DETERMINATION: SANDAG June 30, 2020 - April 15, 2029

Methodology

San Diego County: June 30, 2020 – April 15, 2029 (8.8 years) HCD Determined Population, Households, & Housing Unit Need					
1.					3,613,215
2.	Population: April 15, 2029 (DOF June 30, 2029 projection adjusted minus 2.5 months to April 15, 2029)				
3.	<i>- Group Quarters Population (DOF June 30, 2029 projection adjusted minus 2.5 months to April 15, 2019)</i>				-118,075
4.	Household (HH) Population				3,495,140
	Household Formation Groups	HCD Adjusted DOF Projected HH Population	DOF HH Formation Rates	HCD Adjusted DOF Projected Households	
		3,495,140			
	under 15 years	648,185	n/a	n/a	
	15 – 24 years	504,775	9.98%	50,356	
	25 – 34 years	402,920	37.25%	150,099	
	35 – 44 years	399,705	46.54%	186,020	
	45 – 54 years	428,715	50.72%	217,455	
	55 – 64 years	388,650	53.69%	208,648	
	65 – 74 years	380,010	57.98%	220,348	
	75 – 84 years	250,550	62.03%	155,414	
	85+	91,630	68.51%	62,775	
5.	Projected Households (Occupied Unit Stock)				1,251,115
6.	+ Vacancy Adjustment (2.52%)				31,500
7.	+ Overcrowding Adjustment (3.09%)				38,700
8.	+ Replacement Adjustment (0.50%)				6,255
9.	<i>- Occupied Units (HHs) estimated January 1, 2020</i>				-1,155,883
6th	Cycle Regional Housing Need Assessment (RHNA)				171,685

Explanation and Data Sources

1. Projection period: Gov. Code 65588(f) specifies RHNA projection period start is December 31 or June 30, whichever date most closely precedes end of previous RHNA projection period end date. RHNA projection period end date is set to align with planning period end date. The planning period end date is eight years following the Housing Element due date, which is 18 months following the Regional Transportation Plan adoption rounded to the 15th or end of the month.
- 2-5. Population, Group Quarters, Household Population, & Projected Households: Pursuant to Government Code Section 65584.01, projections were extrapolated from Department of Finance (DOF) projections. Population reflects total persons. Group Quarter Population reflects persons in a dormitory, group home, institute, military, etc. that do not require residential housing. Household Population reflects persons requiring residential housing. Projected Households reflect the propensity of persons, by age groups, to form households at different rates based on Census trends.
6. Vacancy Adjustment: HCD applies a vacancy adjustment (standard 5% maximum to total housing stock) and adjusts the percentage based on the County's current "for rent and sale" vacancy percentage to provide healthy market vacancies to facilitate housing availability and resident mobility. Adjustment is difference between standard 5% vacancy rate and County's current vacancy rate based on the 2012-2016 American Community Survey (ACS) data.
7. Overcrowding Adjustment: In Counties where overcrowding is greater than the U.S. overcrowding rate of 3.34%, HCD applies an adjustment based on the amount the County's overcrowding rate exceeds the U.S. overcrowding rate. Data is from the 2012-2016 ACS.
8. Replacement Adjustment: HCD applies a replacement adjustment between 0.5% and 5% to total housing stock based on the current 10-year annual average percent of demolitions, applied to length of the projection period. Data is from County local government housing survey reports to DOF.
9. Occupied Units: This figure reflects DOF's estimate of occupied units at the start of the January closest to the projection period start date, per DOF E-5 report.

Appendix B – HCD Findings on Draft RHNA Methodology

**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



November 1, 2019

Hasan Ikharta, Executive Director
San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101-4231

Dear Director Ikharta:

RE: Review of Draft Regional Housing Need Allocation (RHNA) Methodology

Thank you for submitting the draft San Diego Association of Governments (SANDAG) Sixth Cycle Regional Housing Need Allocation (RHNA) Methodology. Pursuant to Government Code Section 65584.04(i), the California Department of Housing and Community Development (HCD) is required to review draft RHNA methodology to determine whether the methodology furthers the statutory objectives described Government Code Section 65584(d).

The draft SANDAG methodology uses jobs and transit to set the overall RHNA number for a city and uses an equity adjustment to adjust for income distribution among the sub-categories of RHNA by income. HCD has completed its review and finds that the draft SANDAG RHNA Methodology furthers the five statutory objectives of RHNA.¹

Below is a brief summary of findings related to each statutory objective described within 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.

HCD's analysis shows that this methodology generally allocates more lower income RHNA in jurisdictions with more single-family homes, which will encourage higher density planning in these jurisdictions and a mix of housing types. Also, in support of the affordability objective, the draft methodology allocates more lower income RHNA in more costly areas of the region.

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 draft allocation furthers the infill and environmental principles of this objective, as the overall allocation is based on the location of jobs and transit access. Particularly relevant to supporting infill development and climate change goals is the fact that this methodology

¹ While HCD finds that this methodology furthers the objectives of RHNA, HCD's determination may change in regards to a different region or cycle, as housing conditions in those circumstances may differ.

(continued from previous page)

does not consider land capacity or vacant land as a determinant of RHNA, and instead focuses on where housing is needed to encourage transit ridership and reduced commutes.

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.

Overall jobs, rather than low-wage jobs, are included as a factor in the methodology, but further analysis shows that using overall jobs combined with the equity adjustment in the methodology leads to a strong overlap between low-wage jobs and lower income RHNA as a percentage of the region's lower income RHNA.

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.

This objective is furthered directly by the equity adjustment included in the draft methodology. The SANDAG equity adjustment provides an upward adjustment toward the regional average for jurisdictions that have a lower percentage of households in a given income category compared to the region. While the equity adjustment explicitly responds to objective four, it also assists in the methodology furthering each of the other objectives.

5. Affirmatively furthering fair housing, which means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

To evaluate this objective HCD used the [2019 HCD/TCAC Opportunity Maps](#),² which evaluate access to opportunity, racial segregation, and concentrated poverty on 11 dimensions, which are all evidence-based indicators related to long term life outcomes. The six jurisdictions that would receive the highest percentage of lower income RHNA under this methodology are also the jurisdictions that have no segregated concentrated areas of poverty or lowest resource census tracts, and compared to other jurisdictions in the region have the highest percentage of area in high or highest resource census tracts (76-100% of the jurisdiction). Conversely, the jurisdictions with large amounts of area in low resource census tracts or census tracts that demonstrate high segregation and concentrations of poverty generally receive less lower income RHNA than the regional average.

² Created by the California Fair Housing Task Force and commissioned by HCD and the California Tax Credit Allocation Committee (TCAC) to assist public entities in affirmatively furthering fair housing. The version used in this analysis is the 2019 HCD/TCAC Opportunity Maps available at treasurer.ca.gov/ctcac/opportunity.asp.

HCD appreciates the active role of SANDAG staff in providing data and input throughout the draft methodology development and review period, as well as developing a methodology that is clear and transparent. HCD especially thanks Seth Litchney and Coleen Clementson for their significant efforts and assistance.

Public participation in the development and implementation of the RHNA process is essential to effective housing planning. HCD applauds SANDAG on its efforts to date and the region should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available while considering and incorporating comments where appropriate.

HCD looks forward to continuing our partnership with SANDAG to assist its member jurisdictions meet and exceed the planning and production of the region's housing need.

Just a few of the support opportunities available for the SANDAG region this cycle include:

- SB 2 Planning Grants and Technical Assistance (Available now, application deadline November 30, 2019, technical assistance available now through June 2021)
- Regional and Local Early Action Planning Grants (25% of Regional funds available now, all other funds available early 2020)
- SB 2 Permanent Local Housing Allocation (Available April – July 2020)

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Megan Kirkeby, Assistant Deputy Director for Fair Housing, megan.kirkeby@hcd.ca.gov.



Megan Kirkeby
Assistant Deputy Director for Fair Housing

Appendix C – SANDAG Resolution No. 2020-13



401 B Street, Suite 800
 San Diego, CA 92101
 Phone (619) 699-1900
 Fax (619) 699-1905
 sandag.org

Resolution No. 2020-13

A Resolution Adopting the Final Regional Housing Needs Assessment Methodology for the Sixth Housing Element Cycle (2021 – 2029) for the San Diego Region

WHEREAS, California state housing element law requires that the San Diego Association of Governments (SANDAG) adopt a methodology for distributing the existing and projected regional housing need to the local jurisdictions within the San Diego region; and

WHEREAS, the California Department of Housing and Community Development (HCD) is required to consult with SANDAG in determining the existing and projected housing need for the region prior to each housing element cycle; and

WHEREAS, HCD provided SANDAG with a regional housing need number of 171,685 units distributed to four income categories, very-low (24.7%), low (15.5%), moderate (17.3%), and above-moderate (42.5%) for the 6th Housing Element Cycle (2021-2029) (collectively, RHNA Determination); and

WHEREAS, SANDAG with the assistance of the Regional Housing Needs Assessment (RHNA) Subcommittee, which is a subcommittee of the SANDAG Board of Directors, and also with input from the Regional Planning Committee and Regional Planning Technical Working Group, developed a draft methodology based on comparable data available for all affected jurisdictions and accepted planning methodology and allocating the region's housing needs by jurisdiction and distributing the housing need by income category; and

WHEREAS, at its September 14, 2018, meeting, the SANDAG Board of Directors was surveyed to determine each member jurisdiction's priorities for the upcoming RHNA cycle, including which RHNA objectives and factors would be most important when determining the distribution of housing units in the region; and

WHEREAS, on July 26, 2019, the SANDAG Board of Directors released for public comment the Draft 6th Cycle RHNA Methodology, including its underlying data and assumptions, an explanation of how information about local government conditions was used to develop the draft methodology, how each of the factors required by state law were considered, and how the draft methodology furthers the objectives in state law; and

WHEREAS, on September 6, 2019, the SANDAG Board of Directors hosted a public hearing to receive additional oral and written comments on the draft methodology and closed the 42-day public comment period; and

WHEREAS, in considering the public comments received, the SANDAG Board of Directors also authorized at its September 6, 2019 meeting, the transmittal of the Draft 6th Cycle Regional Housing Needs Assessment Methodology to HCD for a 60-day review period; and

WHEREAS, on November 1, 2019, HCD determined that the draft methodology furthers the objectives set forth in state law;

NOW THEREFORE BE IT RESOLVED THAT the SANDAG Board of Directors adopts the following as the final regional housing needs assessment methodology for the sixth housing element cycle (2021 – 2029) for the San Diego region pursuant to state law:

1. Of the total housing units, 65% will be allocated to jurisdictions with access to transit, including rail stations, Rapid transit vehicle stations, and major transit stops. Significant investments in transit have been made throughout the region, and the methodology prioritizes housing growth in those areas with access to transit. Encouraging housing growth near transit can promote infill development (developing vacant or under-used land within existing urban areas that are already largely developed) and preserve open space, as most transit is located in urbanized areas. Improved access to transit also can lower the vehicle miles traveled in a car and reduce greenhouse gas emissions.
2. Within the housing units allocated for jurisdictions with access to transit, 75% of the units will be allocated to jurisdictions with rail stations and Rapid transit vehicle stations and 25% will be allocated to jurisdictions with major transit stops. To ensure future growth is located near transit, the methodology prioritizes 75% of the housing units in areas with rail and Rapid transit vehicle stations. Rail stations and Rapid transit vehicle stations are usually located along fixed routes that require significant capital investment to construct. Unlike bus stops or routes, rail and Rapid stations and routes are not amended or eliminated on a regular basis. The remaining 25% of the housing units will be allocated in jurisdictions with major transit stops. Major transit stops, as defined in state law, have two intersecting bus routes that arrive at 15-minute intervals during peak commute hours.
3. Of the total housing units, 35% will be allocated to jurisdictions based on the total number of jobs in their jurisdiction. Jurisdictions should plan for housing to provide opportunities for more residents to live near their place of employment, promoting infill development, and improving the intraregional relationship between jobs and housing.
4. The methodology further applies an equity adjustment. The RHNA Determination divided the number of housing units needed in the region into four income categories based on the region's current percentages of households in each income category. The equity adjustment includes a calculation of the existing households in each jurisdiction in each income category. To promote equity and fair housing, as well as to meaningfully address patterns of segregation, the methodology will allocate more housing units within each income category to jurisdictions with a percentage of households in that same category that is lower than the regional percentage.

PASSED AND ADOPTED this 22nd day of November 2019.



Chair

Attest:



Secretary

Member Agencies: Cities of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, Vista, and County of San Diego.

Advisory Members: California Department of Transportation, Metropolitan Transit System, North County Transit District, Imperial County, U.S. Department of Defense, Port of San Diego, San Diego County Water Authority, Southern California Tribal Chairmen's Association, and Mexico.

Appendix D – SANDAG Resolution No. 2021-02



401 B Street, Suite 800
San Diego, CA 92101
Phone (619) 699-1900
Fax (619) 699-1905
sandag.org

Resolution No. 2021-02

Resolution Adopting the Final Regional Housing Needs Assessment Plan for the Sixth Housing Element Cycle (2021 – 2029) for the San Diego Region

WHEREAS, the California Legislature has declared that the availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order;

WHEREAS, the California Legislature has declared that insufficient housing in job centers hinders the state's environmental quality and runs counter to the state's environmental goals because Californians seeking affordable housing are forced to drive longer distances to work;

WHEREAS, this results in an increased amount of greenhouse gases and other pollutants to be released, jeopardizing the achievement of the state's climate and clean air goals;

WHEREAS, the California Legislature intends that cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need;

WHEREAS, the California Department of Housing and Community Development (HCD) determined that the San Diego region's existing and projected housing need for the sixth housing element cycle is 171,685 units distributed among four income categories based on the regional percentage of very low (24.7%), low (15.5%), moderate (17.3%), and above moderate (42.5%) income households;

WHEREAS, state housing element law requires that the San Diego Association of Governments (SANDAG) adopt a Regional Housing Needs Assessment (RHNA) Plan allocating the entire regional share of the statewide housing need prior to the due date for each housing element cycle;

WHEREAS, at its September 14, 2018, meeting, the Board of Directors was surveyed to determine each member jurisdiction's priorities for the upcoming RHNA cycle, including which RHNA objectives and factors would be most important when determining the distribution of housing units in the region;

WHEREAS, SANDAG with the assistance of the RHNA Subcommittee, which is a subcommittee of the Board, and also with input from the Regional Planning Committee and the Regional Planning Technical Working Group, developed a draft methodology based on comparable data available for all jurisdictions and accepted planning methodology that would allocate the region's housing need by jurisdiction and distribute the housing need by income category;

WHEREAS, following the public comment period for the draft RHNA methodology, which included a public hearing on September 6, 2019, HCD reviewed the draft RHNA methodology and found that it furthers the five objectives in Government Code Section 65584(d);

WHEREAS, the Board adopted the final RHNA methodology and issued the draft RHNA allocation for the sixth housing element cycle on November 22, 2019;

WHEREAS, on or about January 6, 2020, SANDAG received four appeals from local governments for a revision of each of their shares of the regional housing need for the sixth housing element cycle and on or about February 21, 2020, SANDAG received five comments on those appeals;

WHEREAS, on February 28, 2020, the Board ratified an action by the SANDAG Executive Committee extending the time period for conducting the public hearing on RHNA appeals and comments on appeals to March 27, 2020, consistent with Government Code Section 65584.05(i);

WHEREAS, on or about March 4, 2020, Governor Gavin Newsom declared a state of emergency to help the state prepare for the spread of COVID-19, and on March 19, 2020, the Governor issued Executive Order N-33-20, which ordered all residents to stay home (Stay at Home Order) to protect the public health of Californians and mitigate the impact of COVID-19;

WHEREAS, as a result of the Stay at Home Order, the SANDAG Executive Director, with concurrence of the Chair of the Board, postponed the hearing on the four appeals to April 10, 2020, and the postponement was ratified by the Board on March 28, 2020;

WHEREAS, on April 1, 2020, the SANDAG Executive Director, with concurrence of the Chair of the Board, again postponed the hearing until such time as an in-person hearing could be held consistent with physical distancing requirements, and the postponement was ratified by the Board on April 10, 2020;

WHEREAS, on May 22, 2020, in recognition of the uncertainty around scheduling an in-person hearing during the Covid-19 health emergency, the approaching deadline of April 2021 for completion of sixth cycle housing elements, and the availability of adequate video conferencing tools, the Board of Directors scheduled a public hearing for June 26, 2020, to consider the appeals and all comments received on the appeals;

WHEREAS, at the July 26, 2020, meeting, the Board made a final determination on each appeal, adopted written findings as to how its determinations are consistent with state housing element law, and issued a proposed final RHNA Allocation Plan, which reflects adjustments to allocations to local governments based on the results of the appeals process and maintains the total regional housing need as determined by HCD;

WHEREAS, Government Code Section 65584.04(m) requires that the final RHNA Allocation Plan allocate housing units within the region consistent with the sustainable communities strategy in the regional transportation plan, ensure that the total regional housing need by income category is maintained, allocate units for low- and very low-income households to each jurisdiction in the region, and further the objectives listed in Government Code Section 65584(d), which include:

- (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;

WHEREAS, Government Code Section 65584.045 further states that the resolution approving the final RHNA Allocation Plan for the sixth housing element cycle use the sustainable communities strategy (SCS)

in the regional transportation plan adopted by SANDAG on October 9, 2015 (2015 SCS), to demonstrate consistency;

WHEREAS, the 2015 SCS found that jurisdictions in the region have changed their land use plans significantly, resulting in development patterns that concentrate future growth in urbanized areas, reduce sprawl, preserve more land for open space and natural habitats, and use the region's water and energy supplies more efficiently;

WHEREAS, the 2015 SCS identified as a strategy toward sustainability a focus on housing and job growth in urbanized areas where there is existing and planned transportation infrastructure, including transit;

WHEREAS, the 2015 SCS land use pattern accommodates 79% of all housing and 86% of all jobs within the portion of the region covered by the Urban Area Transit Strategy, where the greatest investments in public transit are focused, and contemplates more than 80% of new housing in the region will be attached multifamily with the greatest employment density and building intensity in existing employment centers; and

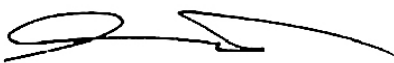
WHEREAS, on July 10, 2020, the Board held a public hearing to adopt the final RHNA Allocation Plan for the sixth housing element cycle consistent with Government Code Section 65584.05;

NOW THEREFORE BE IT RESOLVED that the SANDAG Board of Directors adopts the final RHNA Allocation Plan for the sixth housing element cycle (2021 – 2029) for the San Diego region pursuant to state law and finds that the final RHNA Allocation Plan:

1. Reflects adjustments to allocations to local governments based on the results of the appeals process and maintains the total regional housing need as determined by HCD;
2. Allocates housing units within the region consistent with the development pattern in the 2015 SCS;
3. Ensures that the total regional housing need by income category is maintained;
4. Allocates units for low- and very low-income households to each jurisdiction in the region; and
5. Furthers the objectives listed in Government Code Section 65584(d).

PASSED AND ADOPTED this 10th day of July 2020.

Attest:



Chair



Secretary

Member Agencies: Cities of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, Vista, and County of San Diego.

Advisory Members: California Department of Transportation, Metropolitan Transit System, North County Transit District, Imperial County, U.S. Department of Defense, Port of San Diego, San Diego County Water Authority, Southern California Tribal Chairmen's Association, and Mexico.