



**DRAFT**

# 6th Cycle Regional Housing Needs Assessment Methodology



September 6, 2019



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## Overview

On July 5, 2018, the State Department of Housing and Community Development (HCD) determined the San Diego region would need to plan for 171,685 housing units (Regional Housing Needs Assessment [RHNA] Determination) during the 6th Housing Element Cycle (2021-2029). As the council of governments for the San Diego region, the San Diego Association of Governments (SANDAG) is responsible for developing a methodology for allocating the regional housing need among the region's 19 jurisdictions. The methodology must distribute each jurisdiction's housing unit allocation among the four income categories – low, very-low, moderate, and above moderate – and further the objectives set forth in state law.

State housing element law requires SANDAG to provide a discussion of the draft methodology that includes the data and assumptions relied upon, and an explanation of how information about local government conditions and how each of the factors required by law was used to develop the draft methodology. (See Government Code Section 65584.04.) SANDAG must also describe how the draft methodology would further the five objectives in Government Code Section 65584. This document is meant to provide the information required by statute to assist the public in understanding the basis for the draft methodology.

State law also prohibits consideration of certain criteria. The following justifications have not been used in development of the draft methodology and cannot be the basis for a determination of a jurisdiction's share of the regional housing need:

1. Any ordinance, policy, voter-approved measure, or standard of a city or county that directly or indirectly limits the number of residential building permits issued by a city or county.
2. Prior underproduction of housing in a city or county from the previous regional housing need allocation.
3. Stable population numbers in a city or county from the previous regional housing needs cycle.

In addition to state housing element law, state law associated with development of Regional Transportation Plans (RTPs) requires that there be consistency between transportation planning, development of housing, and reduction of greenhouse gas (GHG) emissions. (Government Code Sections 65080 and 65584.) Increased use of public transportation leads to reduced GHG emissions compared to driving alone. This is why the draft methodology was developed with an eye toward maximizing access between public transportation and all housing types.

On July 26, 2019, the SANDAG Board of Directors released this draft methodology for public review. The Board held a public hearing and concluded the public review period on September 6, 2019. SANDAG received over 2,000 comments on the draft methodology from jurisdictions, organizations, and members of the public. SANDAG posted all public comments, a series of frequently asked questions, and responses to comments [online](#).

After consideration of the comments received, the Board authorized staff to submit the Draft 6th Cycle Regional Housing Needs Assessment Methodology to HCD for review. Within 60 days, HCD will review the draft methodology and provide any findings to SANDAG. The Board will be asked to adopt a final methodology in late 2019. At that time, a draft allocation showing the number and types of housing units allocated to each jurisdiction based on the final adopted methodology will be posted on SANDAG's website. The draft allocation will be distributed to the local jurisdictions and HCD for an additional 45-day review by those entities. After the RHNA Plan, including both the methodology and the allocation, is adopted it will be incorporated in the RTP for the region (2021 Regional Plan) and in the housing elements in each local jurisdiction's general plan.

## Draft Regional Housing Needs Assessment Methodology

The draft methodology released for public review includes the following components.

- 1. Of the total housing units, 65% will be allocated to jurisdictions with access to transit, including rail stations, *Rapid* bus stations, and major transit stops.** Significant investments in transit have been made throughout the region, and the draft 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 GHG 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* bus stations and 25% will be allocated to jurisdictions with major transit stops.** To ensure future growth is located near transit, the draft methodology prioritizes 75% of the housing units in areas with rail and *Rapid* bus stations. Rail stations and *Rapid* bus stations usually are 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 allocation 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, the draft 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.

## Underlying Data and Assumptions

The draft methodology consists of a transit component, jobs component, and equity adjustment. The underlying data and assumptions used in each component and the equity adjustment are discussed below.

### Transit

Of the total housing units, 65% (111,595 housing units) will be 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, lower-vehicle miles traveled, and reduce GHG emissions.

The transit component measures each jurisdiction's share of rail & *Rapid* Stations and major transit stops, which are defined below.

- Rail & Rapid (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* bus 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 the morning and afternoon peak commute periods.

Of the units allocated based on the transit component, 75% (83,696 housing units) will be allocated based on each jurisdiction's share of R&R Stations, while 25% (27,899 housing units) will be 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. Additionally, rail and *Rapid* routes have higher capacities and are among the more popular transportation services in the region. Therefore, the draft methodology assumes these services can have a larger impact on changing 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 6th 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 a R&R station (served by the NCTD COASTER and MTS Trolley) and 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 1.

Table 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%
<b>Region</b>	<b>154</b>	<b>100.0%</b>	<b>140</b>	<b>100.0%</b>

Sources: R&R Stations - SANDAG ABM, Forecast Year 2025 No Build<sup>1</sup>; Major Transit Stops - SANDAG ABM, Forecast Year 2020<sup>2</sup>

## Jobs

Of the total housing units, 35% (60,090 units) will 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 and 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 Defense Manpower Data Center (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.

<sup>1</sup> SANDAG ABM, Forecast Year 2025 No Build, Release v14.0.1, Reference Scenario #242, January 2019.

<sup>2</sup> SANDAG ABM, Forecast Year 2020, Release v14.0.1, Reference Scenario #243, January 2019.

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 2.

Table 2: Jobs Data

Jurisdiction	Total Jobs	Regional Share (%)
Carlsbad	76,779	4.6%
Chula Vista	72,403	4.4%
Coronado	27,594	1.7%
Del Mar	4,484	0.3%
El Cajon	45,468	2.7%
Encinitas	27,871	1.7%
Escondido	55,059	3.3%
Imperial Beach	4,936	0.3%
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	921,054	55.6%
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%
<b>Region</b>	<b>1,656,001</b>	<b>100.0%</b>

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

## 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 the San Diego region is \$66,529, as provided by HCD. Table 3 provides the definition for each income category and the income ranges for San Diego region households per category.

Table 3: Income Categories

Income Category	Definition	Income Range*	Percent of Regional Households (RHNA Determination)
<b>Very Low</b>	Less than 50% of AMI	\$33,259 or less	24.7%
<b>Low</b>	50-80% of AMI	\$33,260 - \$53,219	15.5%
<b>Moderate</b>	80-120% of AMI	\$53,220 - \$79,829	17.3%
<b>Above Moderate</b>	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 of households per category in each jurisdiction and subsequently each jurisdiction's percentage breakdown of households per category, which is included in Table 4. The jurisdictional percentages were then compared to the regional percentages for each income category to determine a multiplier, which is an "adjustment" toward the regional percentages.

Table 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%
<b>Region</b>	<b>1,103,128</b>	<b>271,661</b>	<b>24.6%</b>	<b>173,760</b>	<b>15.8%</b>	<b>188,713</b>	<b>17.1%</b>	<b>468,995</b>	<b>42.5%</b>

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

A jurisdiction’s multiplier for a given income category is applied to the total RHNA units allocated to the jurisdiction to determine how many of its total RHNA units are allocated to that income category.

Jurisdictions that have a higher percentage of existing households in a given income category than the region receive a downward adjustment toward the regional percentage, which results in a smaller share of the allocated housing units within that income category than if no adjustment were applied. Jurisdictions that have a lower percentage of households in a given income category than the region receive an upward adjustment toward the regional percentage, which results in a greater share of the allocated housing units within that income category than if no adjustment were applied.

Table 5 below shows this inverse relationship by using plus (+) and minus (-) signs in the Adjustment (Adjust.) column. The regional percentages of household per income category are included in the first row and shaded in blue. The jurisdictions’ percentages of household per income category are included in the “Percent of Households” (% of HH) and shaded in grey.

Table 5: Determining an Equity Adjustment

<b>Region</b>	<b>Very Low</b>	<b>24.7%</b>	<b>Low</b>	<b>15.5%</b>	<b>Moderate</b>	<b>17.3%</b>	<b>Above Mod.</b>	<b>42.5%</b>
<b>Jurisdiction</b>	<b>% of HH</b>	<b>Adjust.</b>	<b>% of HH</b>	<b>Adjust.</b>	<b>% of HH</b>	<b>Adjust.</b>	<b>% of HH</b>	<b>Adjust.</b>
Carlsbad	16.3%	+	10.8%	+	13.8%	+	59.1%	-
Chula Vista	25.0%	-	15.4%	+	17.5%	-	42.0%	+
Coronado	16.8%	+	12.3%	+	16.1%	+	54.9%	-
Del Mar	19.0%	+	4.5%	+	11.0%	+	65.5%	-
El Cajon	37.8%	-	17.5%	-	17.0%	+	27.7%	+
Encinitas	18.1%	+	9.2%	+	13.4%	+	59.3%	-
Escondido	30.7%	-	18.2%	-	18.2%	-	32.8%	+
Imperial Beach	31.9%	-	23.3%	-	19.1%	-	25.7%	+
La Mesa	26.8%	-	18.8%	-	19.4%	-	35.0%	+
Lemon Grove	27.4%	-	19.4%	-	20.4%	-	32.8%	+
National City	40.6%	-	20.6%	-	17.9%	-	20.9%	+
Oceanside	26.3%	-	18.5%	-	18.4%	-	36.9%	+
Poway	15.3%	+	10.6%	+	14.4%	+	59.6%	-
San Diego	24.3%	+	15.4%	+	16.9%	+	43.5%	-
San Marcos	26.5%	-	14.5%	+	17.3%	+	41.8%	+
Santee	17.9%	+	14.4%	+	18.9%	-	48.8%	-
Solana Beach	15.4%	+	12.1%	+	14.9%	+	57.7%	-
Unincorporated	22.5%	+	16.6%	-	17.3%	+	43.6%	-
Vista	29.4%	-	18.8%	-	20.0%	-	31.8%	+

Source: 2012-2016 American Community Survey (ACS) 5-Year, B19001

#### Data Source

SANDAG used data from the 2012-2016 ACS 5-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.

## Local Government Conditions

The draft methodology was developed with input and recommendation from the Board of Directors, RHNA Subcommittee (a subcommittee of the SANDAG Board), the TWG (including planning directors from each jurisdiction and housing stakeholders), the SANDAG Regional Planning Committee (a policy advisory committee of the Board), and public stakeholders. Several meetings were held with each stakeholder group and meetings were open to the public. 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.

There was general consensus at the meetings that the approach chosen should keep the draft methodology simple and easy to explain to the public. 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, however, ultimately were not pursued since the draft methodology was developed with the intent to keep it transparent and understandable.

A discussion of each stakeholder group and their major contributions to the development of the draft methodology is included below.

### Board of Directors

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, which consists of the planning or community development director from each jurisdiction, among other members. The Board also directed the formation of a RHNA Subcommittee to review and provide input and guidance on potential policy and technical options for developing the RHNA methodology for allocation of housing units to each jurisdiction in the RHNA Plan. The Board received an update on the preliminary methodology in May 2019 and approved the release of this draft methodology for public comment at its July 26, 2019, meeting.

### Regional Housing Needs Assessment Subcommittee

In December 2018, the Board formed the RHNA Subcommittee, which was 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, the RHNA Subcommittee explored options for how to build consensus around a RHNA methodology that complies with state law while best achieving the goals of the Board. The RHNA Subcommittee held six meetings prior to the Board release of the draft methodology. All meetings were open to the public. 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 vehicle miles traveled and GHG emissions, and relieving traffic congestion
- Include an equity adjustment to ensure the allocation furthered fair housing and increased affordability in all cities and the County of San Diego
- Evaluate opportunities for the military installations within the region to provide housing for military and their families

## Regional Planning Technical Working Group

The TWG is a SANDAG working group that 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 Regional Planning Committee and Board on the development and implementation of San Diego Forward: The 2021 Regional Plan, which includes, and must be consistent with, the RHNA plan. The TWG discussed and provided input on the development of the draft methodology at 11 meetings, 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 draft methodology included:

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

## Regional Planning Committee

The Regional Planning Committee (RPC) is one of the SANDAG policy advisory committees, which provides oversight for the preparation and implementation of San Diego Forward: The Regional Plan. The RPC discussed the RHNA process at two of their 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 that informed the development of the draft methodology included:

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

## Regional Housing Needs Assessment Objectives and Factors

### Objectives

The draft methodology and allocation furthers 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 draft methodology allocates units in all four income categories to each of the region's 19 jurisdictions. The draft 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 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 gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.*

The draft 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 jobs. Transit and job centers 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 does not rely on available space and can occur in areas that already have a dense population, the draft methodology supports provision of housing even in areas that are currently considered built-out.

SANDAG's GHG reduction target, as set by the California Air Resources Board, is to reduce the region's per capita emissions of GHG from cars and light trucks by 15 percent by 2020, compared with a 2005 baseline. By 2035, the target is to reduce GHG emissions by 19 percent per capita. The draft 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 vehicle miles traveled, and increase trip-taking by transit or alternative modes.

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 draft methodology allocates 35 percent 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.

The draft methodology's Equity Adjustment (see Objective 4) also 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.*

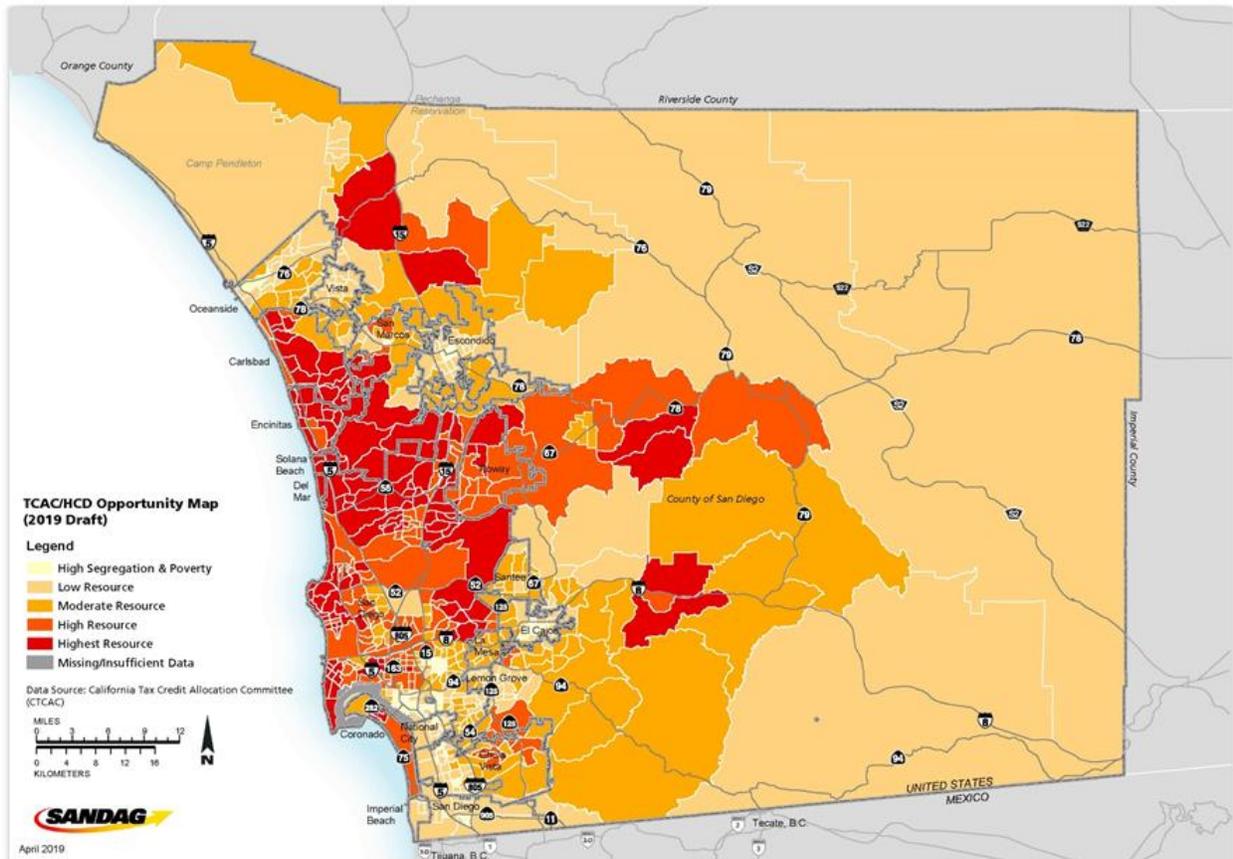
This objective guided the development of the Equity Adjustment used to ensure the draft methodology will result in allocation of housing units to each of the income categories. This adjustment results in a jurisdiction receiving a lower proportion of its total housing units within an income category 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 draft methodology, SANDAG reviewed the California Tax Credit Allocation Committee (TCAC) 2019 Opportunity Map for the San Diego region. 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 & 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 draft 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 draft 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.

## California Tax Credit Allocation Committee Opportunity Map



## Factors

In addition to furthering the objectives outlined above, state law requires that SANDAG consider several factors in the development of the draft methodology, to the extent sufficient data is available pertaining to each factor. See Government Code Section 65584.04(e). The RHNA factors and how each were considered in the development of the draft 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 draft 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 draft methodology is expected to increase the supply of affordable housing by allocating each jurisdiction low- and very low-income housing units. The draft 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 draft methodology, however, the transit factor allocates housing units based on each jurisdiction's share of regional rail and Rapid bus stations as well as major transit stops. Rail and Rapid bus 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 also are located in the region's urbanized areas and surrounded by land uses that support higher service frequencies. By prioritizing transit connectivity, the draft methodology encourages infill development in urban areas that are likely to have existing capacity for sewer or water service.

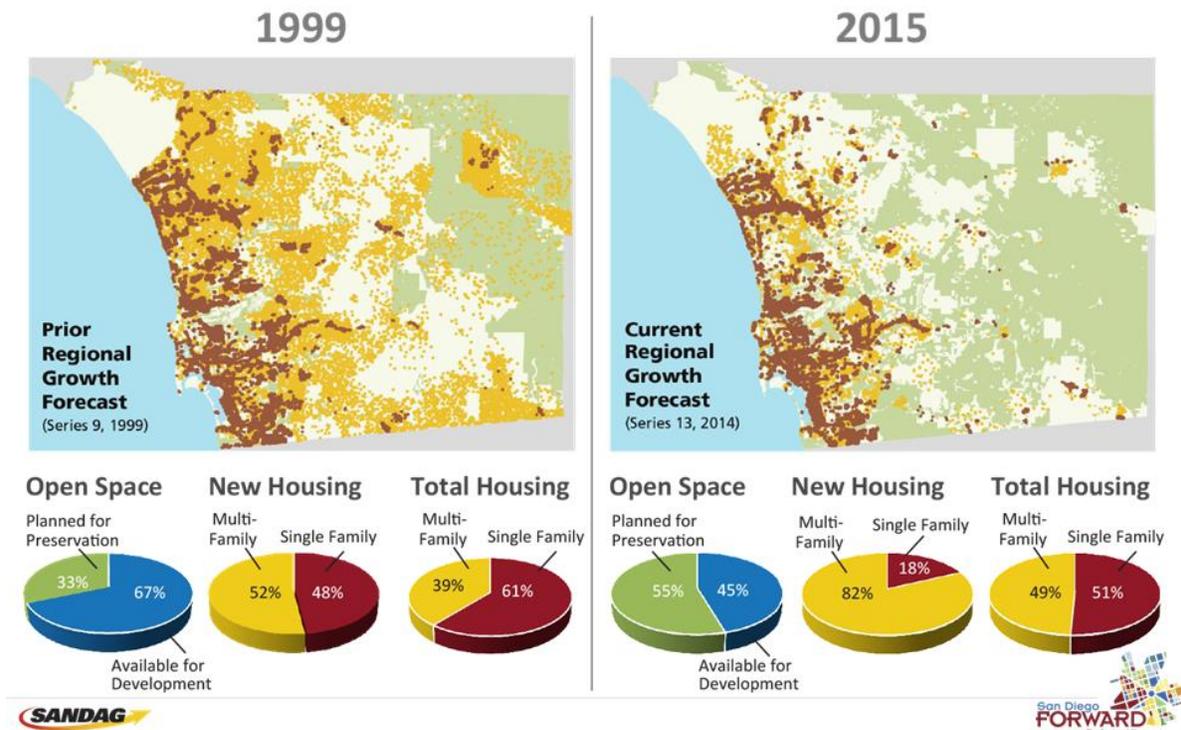
- b. *The availability of land suitable for urban development or for conversion to residential use, the availability of underutilized land, and opportunities for infill development and increased residential densities. The council of governments may not limit its consideration of suitable housing sites 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 draft methodology is not constrained by existing zoning ordinances and land use restrictions. Instead the draft 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 due to the draft methodology's use of the jobs and transit factors. When development of housing is promoted near transit and jobs in areas that are already more densely populated and developed than other areas of each jurisdiction, it allows the jurisdictions to focus on infill development that can occur without reliance on the availability of additional land, but instead 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 rail and Rapid bus stations as well as major transit stops. Rail and Rapid bus 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 draft methodology encourages infill development in areas that are suitable for urban development. A transit-focused methodology also promotes increased densities as jurisdictions must plan for housing in urban areas already served by high quality transit.

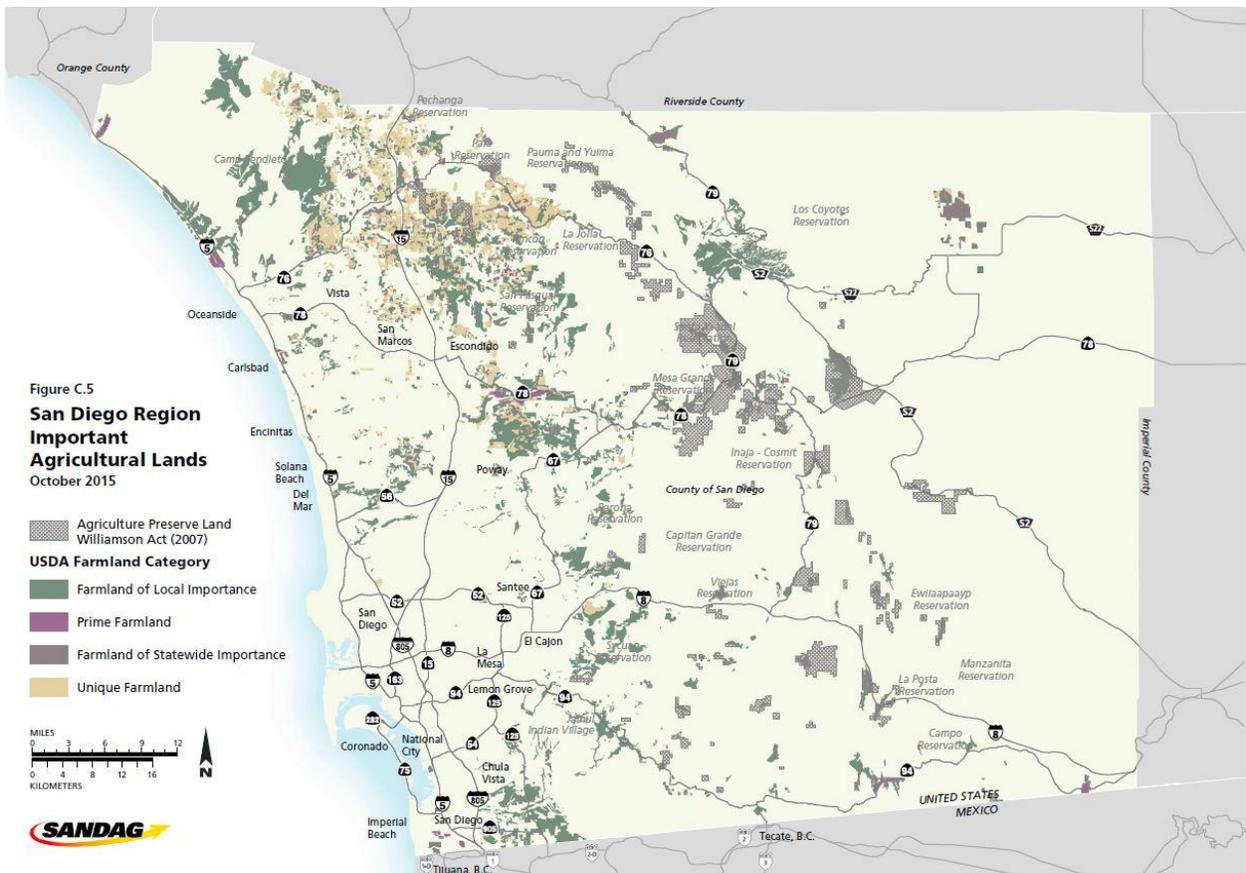
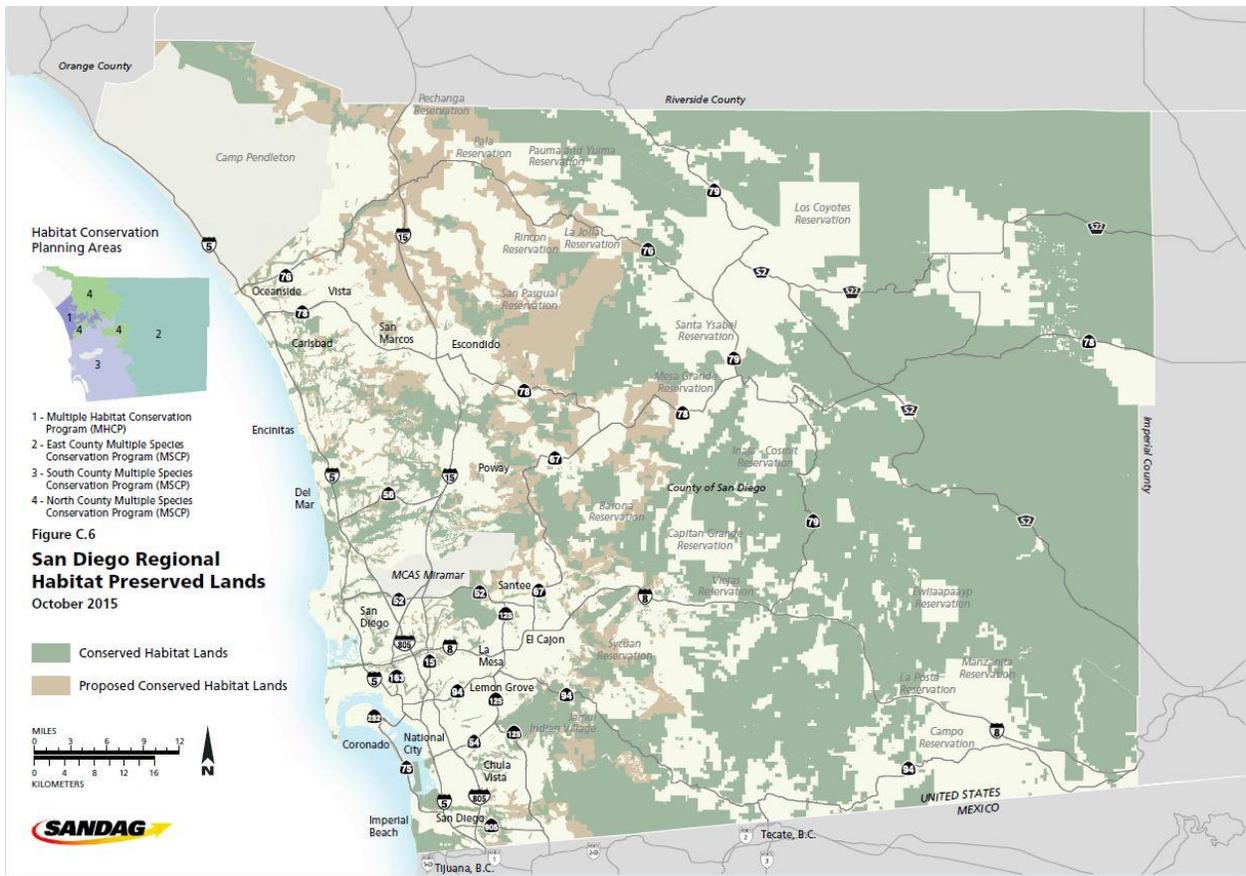
The draft methodology aligns with the region’s priorities for growth. As shown in Figure 3.1, general plans in the San Diego region have focused growth and development in existing urban areas, preserved more land for habitat and open space, and looked to accommodate more housing near transit and key destinations.

**Figure 3.1: Priorities for Growth Then and Now**



- 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. As shown in the figures below though, preserved land, farmland, and habitats are primarily in the eastern portion of San Diego County. The draft methodology focuses housing units in areas with access to transit and jobs, which are located in existing urbanized areas. Therefore, the draft methodology will not encourage encroachment upon open space areas.



- d. *County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated 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 draft 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 draft methodology's capacity to allow for development of additional housing.

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 3.1, plans for growth are focused on the urbanized areas of the region. The draft 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 3.1). 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 draft 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 draft 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 draft 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 should 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 percent and more than 50 percent of their income in rent.*

This factor was not included in state law at the time the 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, however, 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 percent, which added 38,700 housing units to the regional housing need to alleviate overcrowding in the region. Thus, this factor has already been accounted for in the draft methodology.

8. *The housing needs of farmworkers.*

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

The draft methodology increases the supply of affordable housing by allocating each jurisdiction low- and very low-income housing units. The draft 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. Although the low-income housing needs of farmworkers are unique given their low wages and job locations, the allocation expected from the draft methodology is expected to provide more low-income housing in every jurisdiction and accordingly should 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; University of California 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 draft methodology encourages housing development near existing transit and the key destinations that transit links, including the region's universities and colleges. The draft methodology will result in additional housing units being allocated based on transit. This will help these jurisdictions address the housing needs of students, faculty, and staff beyond what these colleges or universities may provide.

10. *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 Department of Finance 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 Department of Finance. The ten-year average rate of demolition in the San Diego region is 0.32 percent of the total housing stock. The RHNA Determination included HCD's minimum replacement adjustment of 0.5 percent, 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.

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

SANDAG's GHG reduction target, as set by the California Air Resources Board, is to reduce the region's per capita emissions of GHG from cars and light trucks by 15 percent by 2020, compared with a 2005 baseline. By 2035, the target is to reduce GHG emissions by 19 percent per capita. The draft 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.

*12. 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 draft methodology. To the extent additional proposed factors are provided to the Board of Directors during the public comment period or public hearing that would lead to adjustments to the draft methodology, such proposals must not interfere with the achievement of any of the objectives or factors required in the RHNA statutes cited in this document. In addition, it must be shown that such factors are necessary to address significant health and safety concerns. Persons proposing that adjustments be made to the draft methodology based on new factors should include information establishing that the requirements in Section 65584.04(e)(12) will be met.