

City of Alhambra
Community Development Department

June 28, 2023

Southern California Association of Governments
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017



Gateway
to the
San Gabriel Valley

111
South First Street
Alhambra
California
91801

Re: RHNA Reform / SCAG Allocation Methodology

Dear SCAG Staff:

Thank you again for the time and the insight shared on March 15, 2023 in Alhambra City Hall with city staff and community stakeholders. We greatly appreciate the feedback provided in response to our questions at the meeting and would welcome additional opportunities to meet and discuss RHNA reform and allocation methodology in the future.

Also, we appreciate the opportunity to provide input regarding RHNA reform. The following are suggestions for your consideration intended to address the issues discussed relating to the allocation methodology.

Job Accessibility: As discussed at the meeting, it is unclear whether the Job Accessibility model adequately considers job centers that are localized. Currently a single model is used to compare job accessibility across the entire Southern California region instead of a more localized approach. Please consider the use of more than one centroid to map job accessibility. Because jobs are regional (e.g., LA basin, Inland Empire, Orange County, etc.) consider whether multiple centroids may result in a more realistic outcome where areas experience job growth and economic booms are reflected in the model.

HQTA: As also discussed, the allocation based on HQTA results in almost one-third of the jurisdictions having zero (0) units allocated based on the HQTA allocation. The result is fundamentally inequitable because jurisdictions that have no HQTA, are not required to have HQTA in the future, are not incentivized to have HQTA in the future, and thus are not required to their share of the 50% of the "existing need." As such, please consider the following as possible approaches to address this issue:

- a. Consider a different split between Job Accessibility and HQTA to account for the fact that certain jurisdictions do not have HQTA.

- b. Implement a floor HQTAs on those jurisdictions that have no or a *de minimus* HQTAs.
- c. Expand the definition of HQTAs to include jurisdictions that receive Metro funding. Certain jurisdictions receive Metro funding, yet have no or very limited HQTAs.
- d. The half-mile definition for HQTAs should be adjusted to differentiate between bus and rail service, as studies show that people will walk $\frac{1}{4}$ mile for bus service, but not $\frac{1}{2}$ mile.
- e. Consider HQTAs mapping in conjunction with population and topography, not simply area coverage. As discussed, a route to a particular station may be more than $\frac{1}{2}$ mile yet be considered within an HQTAs. In addition, an HQTAs may cover areas that are not residential, and thus no residents would theoretically walk the $\frac{1}{2}$ mile to reach a particular station.

Should you have any questions or would like to otherwise further discuss, please feel free reach out to me by phone at (626) 570-5041 or by e-mail at andrewho@cityofalhambra.org.

Sincerely,



Andrew Ho, Director of Community Development