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SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS 900 Wilshire Blvd., Ste. 1700 Los Angeles, CA 90017 T: (213) 236-1800 www.scag.ca.gov

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Executive/Administration Margaret E. Finlay, Duarte

Community, Economic & Human Development Rex Richardson, Long Beach

Energy & Environment Carmen Ramirez, Oxnard

Transportation Curt Hagman, San Bernardino County

#### REGULAR MEETING

# COMMUNITY, ECONOMIC & HUMAN DEVELOPMENT COMMITTEE

Thursday, March 1, 2018 10:00 a.m. – 12:00 p.m.

Please Note NEW Address
SCAG MAIN OFFICE
900 Wilshire Blvd., Ste. 1700
Policy Room B
Los Angeles, CA 90017
(213) 236-1800

If members of the public wish to review the attachments or have any questions on any of the agenda items, please contact Tess Rey-Chaput at (213) 236-1908 or via email at REY@scag.ca.gov. Agendas & Minutes for the Community, Economic & Human Development Committee are also available at: www.scag.ca.gov/committees

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\* 29. Hon. James Mulvihill

## Community, Economic and Human Development Committee Members – March 2018

<u>Members</u>		<u>bers</u>		Representing						
Chair*	1.	Hon.	Rex Richardson	Long Beach	District 29					
Vice Chair*	2.	Hon.	Vartan Gharpetian	Glendale	District 42					
	3.	Hon.	David Avila	Yucaipa	SBCTA					
	4.	Hon.	Al Austin, II	Long Beach	GCCOG					
*	5.	Hon.	Stacy Berry	Cypress	District 18					
	6.	Hon.	Wendy Bucknum	Mission Viejo	OCCOG					
	7.	Hon.	Juan Carrillo	Palmdale	North L.A. County					
	8.	Hon.	Jeffrey Cooper	Culver City	WSCCOG					
	9.	Hon.	Steve De Ruse	La Mirada	GCCOG					
	10.	Hon.	Rose Espinoza	La Habra	OCCOG					
	11.	Hon.	Kerry Ferguson	San Juan Capistrano	OCCOG					
*	12.	Hon.	Margaret E. Finlay	Duarte	District 35					
	13.	Hon.	Debbie Franklin	Banning	WRCOG					
	14.	Hon.	Julie Hackbarth-McIntyre	Barstow	SANBAG					
	15.	Hon.	Christian Hernandez	Cudahy	GCCOG					
	16.	Hon.	Bill Hodge	Calexico	ICTC					
*	17.	Hon.	Peggy Huang	Yorba Linda	TCA					
	18.	Hon.	Cecilia Hupp	Brea	OCCOG					
*	19.	Hon.	Bill Jahn	Big Bear Lake	District 11					
	20.	Hon.	Robert "Bob" Joe	South Pasadena	AVCJPA					
*	21.	Hon.	Barbara Kogerman	Laguna Hills	District 13					
*	22.	Hon.	Sabrina LeRoy	San Manuel Band of Mission	Tribal Government Regional					
				Indians	Planning Board					
	23.	Hon.	Joe Lyons	Claremont	SGVCOG					
*	24.	Hon.	Victor Manalo	Artesia	District 23					
	25.	Hon.	Anni Marshall	Avalon	GCCOG					
*	26.	Hon.	Michele Martinez	Santa Ana	District 16					
	27.	Hon.	Joseph McKee	Desert Hot Springs	CVAG					
	28.	Hon.	Bill Miranda	Santa Clarita	SFVCOG					

San Bernardino

District 7



## Community, Economic and Human Development Committee Members – March 2018

<u>Members</u> <u>Representing</u>

*	20 Han	Stove Nagel	Fountain Valloy	District 15
	30. поп.	Steve Nagel	Fountain Valley	DISTRICT 13
	31. Hon.	Edward Paget	Needles	SANBAG
*	32. Hon.	Erik Peterson	Huntington Beach	District 64
*	33. Sup.	V. Manuel Peréz		Riverside County
*	34. Hon.	Jim Predmore	Holtville	ICTC
*	35. Hon.	John Procter	Santa Paula	District 47
	36. Hon.	Paul Rodriguez	Chino	Member-at-Large
*	37. Hon.	Sonny R. Santa Ines	Bellflower	District 24
*	38. Hon.	Andrew Sarega	La Mirada	District 31
	39. Hon.	David Shapiro	Calabasas	LVMCOG
	40. Hon.	Becky Shevlin	Monrovia	SGVCOG
*	41. Hon.	Tri Ta	Westminster	District 20
*	42. Hon.	Donald P. Wagner	Irvine	District 14
	43. Hon.	Mark Waronek	Lomita	SBCCOG
	44. Hon.	Frank Zerunyan	Rolling Hills Estates	SBCCOG

<sup>\*</sup>Regional Council Member

Southern California Association of Governments Wilshire Grand Center, 900 Wilshire Boulevard, Suite 1700 Los Angeles, California 90017

Thursday, March 1, 2018
10:00 a.m. to 12:00 p.m.

The Community, Economic and Human Development (CEHD) Committee may consider and act upon any of the items listed on the agenda regardless of whether they are listed as Information or Action Items.

#### **CALL TO ORDER AND PLEDGE OF ALLEGIANCE**

(The Honorable Rex Richardson, Chair)

#### **PUBLIC COMMENT PERIOD**

Members of the public desiring to speak on items on the agenda, or items not on the agenda, but within the purview of the Committee, must fill out and present a Public Comment Card to the committee staff prior to speaking. Comments will be limited to three (3) minutes per speaker. The Chair has the discretion to reduce the time limit based upon the number of speakers and may limit the total time for all public comments to twenty (20) minutes.

#### **REVIEW AND PRIORITIZE AGENDA ITEMS**

CON	ISENT CALENDAR	Page No.
App	roval Item	
1.	Minutes of the February 1, 2018 Meeting	1
Rec	eive and File	
2.	Update on Housing Legislation	6
3.	Governor's Office of Planning and Research (OPR) Proposed Updates to the CEQA Guidelines	10
4.	Affordable Housing & Sustainable Communities (AHSC): SCAG Application Review	27
5.	CEHD Committee Proposed Topic Outlook	29



INFORMATION ITEMS	<u>Time</u>	Page No.
<ol> <li>Governor's Office of Planning and Research (OPR)     Proposed SB 743 Implementation Guidelines and     Technical Advisory     (Ping Chang, SCAG Staff)</li> </ol>	20 mins.	30
<ol> <li>Mobile Home Parks as a Source of Affordable Housing (Ma'Ayn Johnson, SCAG Staff)</li> </ol>	15 mins.	40
8. Historic Preservation, Social Equity and Community Engagement (Katie Rispoli Keaotami, Executive Director, We Are the Next)	30 mins.	48
<ol> <li>Update on Bottom-Up Local Input and Envisioning Process (Kimberly Clark, SCAG Staff)</li> </ol>	20 mins.	66

#### **CHAIR'S REPORT**

(The Honorable Rex Richardson)

#### **STAFF REPORT**

#### **FUTURE AGENDA ITEM/S**

#### **ANNOUNCEMENT/S**

#### **ADJOURNMENT**

The next regular meeting of the CEHD Committee is scheduled for Thursday, April 5, 2018 at the Wilshire Grand Center, 900 Wilshire Boulevard, Suite 1700, Los Angeles, CA 90017.



Southern California Association of Governments 900 Wilshire Blvd., Suite 1700, Los Angeles, CA 90017 Agenda Item No. 1 March 1, 2018

## COMMUNITY, ECONOMIC AND HUMAN DEVELOPMENT (CEHD) COMMITTEE MINUTES OF THE MEETING THURSDAY, FEBRUARY 1, 2018

THE FOLLOWING MINUTES ARE A SUMMARY OF ACTIONS TAKEN BY THE CEHD COMMITTEE. A DIGITAL RECORDING OF THE ACTUAL MEETING IS AVAILABLE FOR LISTENING IN SCAG'S OFFICE.

The CEHD Committee met at SCAG, 900 Wilshire Blvd., 17<sup>th</sup> Floor, Los Angeles, CA 90017. The meeting was called to order by Vice Chair Vartan Gharpetian. A quorum was present.

#### **Members Present:**

Hon. Vartan Gharpetian, Vice Chair	Glendale	District 42					
Hon. Al Austin, II	Long Beach	GCCOG					
Hon. David Avila	Yucaipa	SBCTA					
Hon. Stacy Berry	Cypress	OCCOG					
Hon. Wendy Bucknum	Mission Viejo	OCCOG					
Hon. Steve De Ruse	La Mirada	GCCOG					
Hon. Rose Espinoza	La Habra	OCCOG					
Hon. Kerry Ferguson	San Juan Capistrano	OCCOG					
Hon. Margaret E. Finlay	Duarte	District 35					
Hon. Debbie Franklin	Banning	WRCOG					
Hon. Christian Hernandez	Cudahy	GCCOG					
Hon. Bill Hodge	Calexico	ICTC					
Hon. Peggy Huang	Yorba Linda	TCA					
Hon. Cecilia Hupp	Brea	OCCOG					
Hon. Bill Jahn	Big Bear Lake	District 11					
Hon. Robert "Bob" Joe	South Pasadena	AVCJPA					
Hon. Barbara Kogerman	Laguna Hills	District 13					
Hon. Sabrina LeRoy	San Manuel Band of Mission Indians	Tribal Government Regional Planning Board					
Hon. Joe Lyons	Claremont	SGVCOG					
Hon. Victor Manalo	Artesia	District 23					
Hon. Anni Marshall	Avalon	GCCOG					
Hon. Michele Martinez	Santa Ana	District 16					
Hon. Joseph McKee	Desert Hot Springs	CVAG					
Hon. Bill Miranda	Santa Clarita	SFVCOG					

Hon. Steve Nagel	Fountain Valley	District 15
Hon. Edward Paget	Needles	SANBAG
Hon. Jim Predmore	Holtville	ICTC
Hon. John Procter	Santa Paula	District 47
Hon. Paul Rodriguez	Chino	Member-at-Large
Hon. Sonny R. Santa Ines	Bellflower	District 24
Hon. Andrew Sarega	La Mirada	District 31
Hon. David Shapiro	Calabasas	LVMCOG
Hon. Becky Shevlin	Monrovia	SGVCOG
Hon. Tri Ta	Westminster	District 20
Hon. Mark Waronek	Lomita	SBCCOG
Hon. Frank Zerunyan	Rolling Hills Estates	SBCCOG

#### **Members Not Present**

Hon. Rex Richardson, Chair	Long Beach	District 29			
Hon. Juan Carrillo	Palmdale	North L.A. County			
Hon. Jeffrey Cooper	Culver City	WSCCOG			
Hon. Julie Hackbarth-McIntyre	Barstow	SANBAG			
Hon. James Mulvihill	San Bernardino	District 7			
Sup. V. Manuel Peréz		<b>Riverside County</b>			
Hon. Erik Peterson	Huntington Beach	District 64			
Hon. Donald P. Wagner	Irvine	District 14			

#### **CALL TO ORDER AND PLEDGE OF ALLEGIANCE**

Vice Chair Vartan Gharpetian, called the meeting to order at 10:15 a.m. and asked Councilmember Joe Lyons, SGVCOG, to lead the Pledge of Allegiance.

#### **PUBLIC COMMENT PERIOD**

There were no public comments.

#### **REVIEW AND PRIORITIZE AGENDA ITEM/S**

There was no reprioritization of the agenda.

#### **CONSENT CALENDAR**

#### **Approval Item**

1. Minutes of the CEHD Committee Meeting – December 7, 2017

#### **Receive & File**

2. <u>Governor's Office of Planning and Research (OPR) Proposed SB 743 Implementation Guidelines and Technical Advisory gate of California 2017 Climate Change Scoping Plan</u>

Item #2 was pulled by Councilmember Wendy Bucknum.

Ping Chang, Acting Manager for the Compliance and Performance Monitoring Department, provided background information and a current status update of OPR's proposed SB 743 Implementation Guidelines. He noted that staff is currently reviewing comments and feedback regarding the regulatory modifications, and will transmit this information to the RC and Policy Committees when finalized. Mr. Chang encourage the members to provide comments to staff during the SCAG comment period by February 28, 2018, in order for staff to provide a final report at the March 1, 2018 CEHD meeting.

A MOTION was made (Bucknum) to approve the Consent Calendar Agenda Item No. 2, SECONDED and passed by the following votes:

FOR:

Austin, Avila, Berry, Bucknum, De Ruse, Espinoza, Ferguson, Finlay, Franklin, Gharpetian, Hernandez, Hodge, Huang, Hupp, Jahn, Joe, Kogerman, Leroy, Lyons, Manalo, Martinez, McKee, Miranda, Nagel, Paget, Predmore, Procter, Rodriguez, Santa Ines, Sarega, Shapiro, Shevlin, Ta, Waronek and Zerunyan (35).

- 3. Governor's Office of Planning and Research (OPR) Proposed Updates to the CEQA Guidelines
- 4. Updated California Air Resources Board Pollution Mapping Tool
- 5. <u>CEHD Committee Proposed Topic Outlook</u>

A MOTION was made to approve the Consent Calendar Agenda Items No. 1, 3-5. Motion was SECONDED (Martinez) and passed by the following votes:

FOR:

Austin, Avila, Berry, Bucknum, De Ruse, Ferguson, Franklin, Gharpetian, Hernandez, Hodge, Huang, Hupp, Jahn, Joe, Kogerman, Leroy, Lyons, Manalo, Martinez, McKee, Miranda, Nagel, Paget, Predmore, Procter, Rodriguez, Santa Ines, Sarega, Shevlin, Ta, Waronek and Zerunyan (32).

AGAINST: None (0).

ABSTAIN: None (0).

#### **INFORMATION ITEMS**

6. Summary of the Department of Finance's 2017 Population Growth Estimates for the SCAG Region

Kevin Kane, SCAG Staff, presented on the Department of Finance's (DOF) 2017 Population Growth Estimates for the SCAG Region. He provided background information of the official population estimates and its consistency with SCAG's preliminary forecast for the 2020 RTP/SCS. There were no additional discussions or comments made on this item.

7. <u>Proposition 64: Local Regulation and Zoning Requirements and Updates for Commercial Cannabis Activity</u>

Dustin McDonald, VP, Government Relations and Cedric Haynes, Senior Associate, Government Relations, Weedmaps, presented on the new rules and regulations for the local jurisdictions.

Mr. McDonald and Mr. Haynes provided a detailed presentation of the economic impact of the Cannabis industry and for jurisdictions that allow it in California. Discussion ensued and Councilmembers inquired about security requirements for delivery services, speed to market process and licensing, tax revenue, tax complications,

utilities and demand for energy resources, staff resources, future use, enforcement and a discussion and recommendation for local jurisdictions to take an incremental approach to forming cannabis policies, best practices and staff education.

Mr. McDonald responded to the comments and questions expressed by the Councilmembers, including how the state has been slow to deal with the concerns raised over energy consumption and related environmental issues. He noted that the local jurisdictions are free to modify its policies as appropriate for its locality and to think carefully on strategy in moving forward with the formation of its policies, rules and guidelines.

The full report was included in the agenda packet.

#### 8. Update on SCAG's Earthquake Preparedness Initiative

John Bwarie, Dr. Lucy Jones Center for Science and Society gave a presentation on SCAG's Earthquake Preparedness Initiative. Mr. Bwarie explained that the Earthquake Preparedness Initiative (Initiative) is now in its third phase which includes SCAG staff and Dr. Jones' staff working collaboratively with four (4) regional cohorts made up of several dozen local jurisdictions, by geography. The cohorts will be able to provide information and technical assistance that supports the development and implementation for seismic resilience, with self-defined priorities for each jurisdiction. He noted that phase three started in July 2016 and will continue through June 2018. Mr. Bwarie responded to the comments and questions expressed by the Councilmembers, including addressing infrastructure, statewide building codes, retrofit projects and what, if any, financial resources currently available.

#### **CHAIR'S REPORT**

Vice Chair Gharpetian announced that a presentation from Los Angeles Mayor Eric Garcetti regarding "LA 2028" will be presented today after lunch at the Regional Council meeting.

#### **STAFF REPORT**

There was no report.

#### **FUTURE AGENDA ITEM/S**

Ms. Katie Rispoli Keaotamai, from the "We Are the Next" organization will present on historical preservation, civic engagement, and social equity.

#### **ANNOUNCEMENT/S**

Vice Chair Gharpetian announced that CEHD member, Councilmember Stacy Berry, was recently appointed to the SCAG Regional Council for District 18.

#### **ADJOURNMENT**

There being no further business, Vice Chair Gharpetian adjourned the CEHD Committee meeting at 11:51 a.m.

[MINUTES ARE UNOFFICIAL UNTIL APPROVED BY THE CEHD COMMITTEE]

Community, Economic & Human Development Committee Attendance Report  2018																			
	X	X = County Represented X = Attended No Meeting NM = New Member EA = Exc												= Excus	sed Ab	sen			
Member (including Ex- Officio) LastName, FirstName	Representing	IC	LA	ос	RC	SB	<b>v</b> c	Jan	Feb	Mar	Apr	Mav	Jun	Jul	Aua	Sep	Oct	Nov	De
Austin, Al	GCCOG		Х						X						9				
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Berry, Stacy*	OCCOG	┢		X					X										
Bucknum, Wendy	OCCOG	⊢		X					X										
Carrillo, Juan	North LA County	┢	X	^															
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Espinoza, Rose	OCCOG	_		X					X										_
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Finlay, Margaret*	Duarte (District 35)	L	X						X										_
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Hemandez, Christian	GCCOG	L	X						X										
Hodge, Bill	ICTC	X							X										
Huang, Peggy	TCA			X					X										
Hupp, Cecila	OCCOG			X					X										
Jahn, Bill*	SBCTA (District 11)					X			X										
Joe, Robert	Arroyo Verdugo		Х						X										
Kogerman, Barbara*	District 13			Х					Х										
Leroy, Sabrina*	Tribal Nations Rep.				X				Х										
Lyons, Joe	SGVCOG		X						X										
Manalo, Victor*	District 23		Х						Х										
Marshall, Ann	GCCOG		Χ						Х										
Martinez, Michele*	District 16			Х					Х										
Hackbarth-McIntyre, Julie	SBCTA					Х													
McKee, Joe	CVAG				X				Х										
Miranda, Bill	SFVCOG		Х						Х										
Mulvihill, James*	District					Х													
Nagel, Steve*	OCCOG	$\vdash$		Х		<u> </u>			Х										
Paget, Ed	SBCTA	T		<u> </u>		Х			X										
Perez, V. Manuel	Riverside County	T			Х	<u> </u>			<del></del>										
Peterson, Erik*	District 64	T		X	<del></del>														
Predmore, Jim*	ICTC	Х		<u> </u>					Χ										
Procter, John*	VCOG	†					Х		X										
Richardson, Rex*	District 29	$\vdash$	X		$\vdash$	$\vdash$	<u> </u>		<u> </u>										
Rodriguez, Paul	Chino	$\vdash$	<u> </u>		$\vdash$	$\vdash$			X										
Santa Ines, Sonny	GCCOG	$\vdash$	X						X										
Sarega, Andrew*	District 31	$\vdash$	X						X										$\vdash$
Shapiro, David	Las Virgenes-Malibu COG	$\vdash$	X						X										
Shevlin, Becky	SGVCOG	$\vdash$	X						X										
Ta, Tri*	District 20	$\vdash$	^	X					X										
Wagner, Donald*	District 14	$\vdash$	$\vdash$	X					^				<u> </u>						
Waronek, Mark	SBCCOG	$\vdash$	Х	^					Х										
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Zerunyan, Frank Regional Council Member	SBCCOG	_	X						X										





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

Agenda Item No. 2 March 1, 2018

**To:** Community, Economic and Human Development (CEHD)

Committee

EXECUTIVE DIRECTOR'S APPROVAL

Horas Wehath

From: Ma'Ayn Johnson, Housing & Land Use Planner,

213-236-1975, johnson@scag.ca.gov

Subject: Update on Housing Legislation

#### **RECOMMENDED ACTION:**

For Information Only - No Action Required

#### **EXECUTIVE SUMMARY:**

Several bills related to housing have been introduced to the California legislative session this year. Senate Bill 827 (Wiener) proposes a "transit-density bonus" to qualifying projects. Senate Bill 828 (Wiener) proposes changes to the Regional Housing Needs Assessment (RHNA) methodology along with increasing obligations for jurisdictions in their local housing element update. Senate Bill 829 (Wiener) proposes incentives to build farmworker housing. Assembly Bill 1759 (McCarty) proposes that Senate Bill 1 funding be tied to local housing production. In January 2017, SB 827, 828 and 829 were reviewed by SCAG's Legislative/Communications & Membership Committee (LCMC) who directed that staff do additional analysis before the Agency take any formal position. Staff will present these bills to LCMC at their future meetings along with staff recommendations for the LCMC to recommend Regional Council action, with the exception of AB 1759 which LCMC recommended that the agency take an oppose position and is being presented to the Regional Council today.

#### **STRATEGIC PLAN:**

This item supports SCAG's Strategic Plan; Goal 2: Advance Southern California's policy interests and planning priorities through regional, statewide, and national engagement and advocacy; Objective A: Cultivate dynamic knowledge of the major challenges and opportunities relevant to sustainability and quality of life in the region.

#### **BACKGROUND:**

Several bills related to housing have been introduced to the California legislative session this year. Over one hundred housing-related bills were introduced during last year's session, and the bills this year are continuing the momentum of addressing the statewide housing crisis. SCAG staff will present an overview of these bills to the SCAG Legislative, Communications and Membership Committee (LCMC) at their future meetings along with staff recommendations for the LCMC to recommend for Regional Council action, with the exception of AB 1759 which LCMC took an oppose position and is



being presented to the Regional Council today. The overview presented in this report is based on the most recent available versions of the bills as of February 7, 2018, which are the "introduced" versions from January 3 and 4, 2018.

#### Senate Bill 827 (Wiener)

Currently State law allows for a developer to be provided a "density bonus" from a jurisdiction. A density bonus allows for a developer to increase a project's density, or provides other incentives or concessions in exchange for the production of a specified percentage of low income, and in some cases moderate income, housing units. SB 827 would authorize a project that is within one-half mile of a major transit stop or one-fourth mile within a transit-priority area to receive a "transit-rich housing bonus".

This bonus would exempt a qualifying project from maximum density or floor area ratios, along with design standards that would restrict the project's ability to construct the maximum number of units consistent with building code. Additionally, a project is exempt from minimum parking requirements.

#### Senate Bill 828 (Wiener)

SB 828 primarily focuses on the Regional Housing Needs Assessment (RHNA) process. The RHNA allocation is a requirement of State housing law and tasks a council of governments (COG) such as SCAG to determine the projected housing need for all incomes for a jurisdiction (city or unincorporated county) for a specified planning period. The process to determine an individual jurisdiction's RHNA allocation begins with a regional housing need determination that is determined by the California Department of Housing and Community Development (HCD) after consultation with the COG and the California Department of Finance. Once a regional determination is given, the COG adopts its own methodology, which is then applied to the regional allocation to determine an individual jurisdiction's RHNA allocation.

Once the jurisdiction receives its individual RHNA allocation, it is required to conduct a sites and zoning analysis in its housing element of its General Plan to accommodate future household growth as represented by the RHNA allocation. Subsequently, the housing element is reviewed by HCD to ensure that it is compliant with State housing law.

For reference, the current SCAG RHNA allocation, also known as the 5<sup>th</sup> RHNA cycle, was adopted by the Regional Council in October 2012 and covers the planning period October 2013 through October 2021. The 6<sup>th</sup> cycle will be adopted at the latest by October 2020 and will cover the planning period October 2021 through October 2029. Below is a diagram of the general RHNA process with dates corresponding to SCAG's 5<sup>th</sup> RHNA cycle.





SB 828 proposes that the RHNA methodology process that is currently adopted by the COG be altered in several ways.

#### Inclusion of Unmet Housing Need in RHNA Methodology

As written, SB 828 would require HCD to assess "unmet need" from a prior RHNA cycle, which is defined as any housing allocation that was not met from the previous housing cycle based on building permits issued for each RHNA income category. This unmet need would be included with HCD's assessment of future housing need that is currently used to determine the regional RHNA allocation and added to the final RHNA allocation for the jurisdiction as determined by the COG.

Additionally, SB 828 would require that high housing costs and high rates of income growth be included as part of the methodology used by HCD to assess unmet need. Current law requires that the COG provide several key regional data assumptions such as household size, vacancy rates, and other demographic data during the regional determination process with HCD. High housing costs are factored in later during the methodology process developed by the COG under existing law. However, high rates of income growth to ensure equity is currently not a required factor.

#### • Planning for Two Hundred (200) Percent of the RHNA Allocation

SB 828 requires that a local jurisdiction plan and accommodate for 200 percent of their RHNA allocation for all income categories in their housing element. Presumably this RHNA allocation is both the future need determined by the COG and the addition of any unmet need as determined by HCD.

#### Challenge of COG RHNA Methodology from HCD

Under current law, once the regional determination is provided by HCD, the COG develops its own methodology to determine individual RHNA allocations for each jurisdiction. The sum of the individual RHNA allocations by each income category must equal the regional determination by income category determined by HCD from the beginning of the RHNA process. SB 828 would allow for HCD to challenge the COG's RHNA methodology and require the COG to submit its methodology for approval along with its final allocation plan.



#### Senate Bill 829 (Wiener)

Currently State housing law requires that an entity seeking to operate farmworker housing receive a permit from either HCD or the local jurisdiction to do so. While it is unclear on details, the intention of SB 829 is to incentivize farmworkers housing and also allow for HCD to partner private agricultural operators with independent nonprofits to operate and manage farmworker housing. This bill also seeks to protect farmworker housing tenant civil rights.

#### AB 1759 (McCarty)

AB 1759 ties in funds from Senate Bill 1 (Beall), which was approved by Governor Brown in 2017, to building permit activity for each jurisdiction according to their respective RHNA allocations. SB 1 created a statewide program to address highway and local street repair and other transportation improvements funded by an increase in vehicle fees and motor fuel tax.

Currently jurisdictions are required to submit an annual progress report to HCD, which reports how many building permits have been issued by the jurisdiction in each RHNA income category. Under AB 1759, a jurisdiction would only be eligible to receive its share of SB 1 funding if it has met a certain percentage threshold of building permits in comparison to its RHNA allocation and is certified as doing so by HCD. The percentage thresholds increase over the lifespan of the bill. For annual progress reports that cover each year between 2022 and 2027, the threshold is twenty (20) percent. Between 2028 and 2032, the threshold increases to forty (40) percent and then to sixty (60) percent between 2033 and 2039. Finally between 2039 and 2044, the minimum threshold is 80 (80) percent and in the final period of 2045 to 2050, the threshold of building permits issued is one hundred (100) percent of the jurisdiction's RHNA allocation.

SCAG staff's assumption of the bill's minimum production goal is that prior to meeting specified percentage for that period, the jurisdiction is ineligible for receiving SB 1 funding. Based on the bill's language, if a jurisdiction does not meet the production requirements, its anticipated funding for that year is held in an escrow account and reapportioned to eligible cities and counties in that period.

On February 20, 2018, LCMC reviewed AB 1759 and recommended to the Regional Council that the agency take an oppose position to the bill. This matter is before the Regional Council today.

These four bills are subject to change by their authors during the 2018 legislative session. SCAG staff will continue to monitor these and other bills and update the CEHD Committee as needed.

#### FISCAL IMPACT:

Work associated with this item is included in the Fiscal Year 2017-2018 Overall Work Program (080.SCG00153.04: Regional Assessment).

#### **ATTACHMENT/S:**

None.



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

Agenda Item No. 3 March 1, 2018

**EXECUTIVE DIRECTOR'S** 

**APPROVAL** 

Hosas Wehath

**To:** Energy and Environment Committee (EEC)

Community, Economic and Human Development (CEHD)

Transportation Committee (TC)

Regional Council (RC)

From: Roland Ok, Senior Regional Planner, 213-236-1839,

ok@scag.ca.gov

Subject: Governor's Office of Planning and Research (OPR) Proposed

Updates to the CEQA Guidelines

#### **RECOMMENDED ACTION FOR EEC:**

For Information Only - No Action Required

#### **RECOMMENDED ACTION FOR CEHD, TC and RC:**

Receive and File.

#### **EXECUTIVE SUMMARY:**

On November 27, 2017, the Governor's Office of Planning and Research (OPR) transmitted the final proposed amendments to the Guidelines implementing the California Environmental Quality Act (CEQA) to the California Natural Resources Agency. OPR's comprehensive package contains a complete set of updates to the CEQA Guidelines. Proposed updates are aimed towards improving efficiency, substantive analysis, and technical analysis. Updates also include the proposed SB743 Implementation Guidelines (For further details please refer to a separate February 2018 Staff Report titled: Governor's Office of Planning and Research (OPR) Proposed SB743 Implementation Guidelines).

The final rulemaking process now being conducted by the California Natural Resources Agency allows for an additional opportunity for public review and comment. The Natural Resources Agency has established a public comment period which will end on March 15, 2018. SCAG is in the process of drafting a comment letter in response to the proposed updates to the CEQA guidelines.

To provide information to our local stakeholders, SCAG hosted a CEQA Guidelines and SB 743 Workshop on January 31, 2018 at the Caltrans District 7 offices. Comments and feedback received at the workshop have been incorporated into the SCAG's draft comment letter, as appropriate. SCAG has also requested local jurisdictions and stakeholders to provide us comments by February 28, 2018, and will incorporate their input into the comment letter, as appropriate.

A public hearing for the proposed updates to the CEQA guidelines will be held on March 14, 2018, from 1:30 to 4:30 PM at the California Science Center (Annenberg Building-Muses Room), located



at: 700 Exposition Park Dr., Los Angeles, CA 90037. For more information on the rule making process and public comment period, please visit:

http://resources.ca.gov/ceqa/docs/update2018/notice-of-proposed-rulemaking.pdf

For more information on the contents of the proposed updates to the CEQA Guidelines, please visit OPR's website at: <a href="http://opr.ca.gov/ceqa/updates/quidelines/">http://opr.ca.gov/ceqa/updates/quidelines/</a> and California Natural Resources Agency's website at: <a href="http://resources.ca.gov/ceqa/quidelines/">http://resources.ca.gov/ceqa/quidelines/</a>

#### **STRATEGIC PLAN:**

This item supports SCAG's Strategic Plan Goal 2: Advance Southern California's policy interests and planning priorities through regional, statewide, and national engagement and advocacy.

#### **BACKGROUND:**

On November 27, 2017, the Governor's Office of Planning and Research (OPR) transmitted the final proposed amendments to the Guidelines implementing the California Environmental Quality Act (CEQA) to the California Natural Resources Agency for final rulemaking. CEQA requires public agencies, as part of the project approval decision-making process, to evaluate and mitigate a project's potential environmental impacts. OPR is charged with developing the administrative regulations to implement CEQA, and the Natural Resources Agency adopts those regulations following a formal rulemaking process. The implementation regulations, commonly referred to as the CEQA Guidelines, are required to be updated on a regular basis. The last comprehensive update to the CEQA Guidelines was completed in the late 1990s.

#### **OVERVIEW OF PROPOSED UPDATES TO THE CEQA GUIDELINES**

OPR has crafted a comprehensive package of updates to the CEQA guidelines that reflects input obtained through numerous public comment periods and feedback received during informal stakeholder meetings, conferences, and other venues. The OPR proposal contains changes or additions involving nearly thirty different sections, including steps to facilitate and streamline the environmental review process.

Key updates to the CEQA Guidelines include the following:

#### **Efficiency Improvements**

<u>Regulatory Standards:</u> Promotes the use of existing regulatory standards in the CEQA process. Using standards as "thresholds of significance" creates a predictable starting point for analysis and allows lead agencies to rely on the expertise of other regulatory bodies without foreclosing the consideration of any potential project-specific effects.

<u>Updates to the Environmental Checklist:</u> The OPR package proposes to update the environmental checklist that most agencies use to conduct their environmental review. Redundant questions in the existing checklist are eliminated and some questions are updated to address contemporary topics. The checklist has also been updated with several new questions related to transportation



impacts and wildfire risk, pursuant to Senate Bill 743 (Steinberg, 2013), and Senate Bill 1241 (Kehoe, 2012), respectively. It also relocates questions related to paleontological resources as directed by Assembly Bill 52 (Gatto, 2014).

<u>Tiering:</u> The OPR package includes several changes to make the existing programmatic environmental review process easier to use for subsequent projects. Specifically, it clarifies the rules on tiering and provides additional guidance on when a later project may be considered within the scope of a program EIR, thereby obviating the need for additional environmental review.

<u>Exemptions:</u> The OPR package enhances several existing CEQA exemptions. For example, consistent with Senate Bill 743 (Steinberg, 2013), it expands upon an existing exemption for projects implementing a specific plan to include not just residential, but also commercial and mixed-use projects that are located near transit. It also clarifies exemption rules for changes to existing facilities so that vacant buildings can more easily be redeveloped. Changes to that same exemption would also promote pedestrian, bicycle, and streetscape improvements within an existing right of way.

#### **Substantive Improvements**

<u>Energy Impacts Analysis:</u> The OPR package provides new guidance regarding energy impact analysis. Specifically, it requires an EIR to include an analysis of a project's energy impacts that addresses not just building design, but also transportation, equipment use, location, and other relevant factors.

<u>Water Supply Impact Analysis:</u> The OPR package proposes guidance on the analysis of water supply impacts. The guidance is built upon the California Supreme Court decision in *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412 (*Vineyard*). The new provision requires analysis of a proposed project's possible sources of water supply over the life of the project and the environmental impacts of supplying that water to the project. The analysis must consider any uncertainties in supply, as well as potential alternatives.

<u>Greenhouse Gas Emissions Analysis:</u> The OPR package includes proposed updates related to the analysis of impacts from greenhouse gas emissions. The proposed changes reflect current appellate case law, including *Center for Biological Diversity v. Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204; and *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497.

<u>Transportation Impact Analysis:</u> Please refer to a separate March 2018 Staff Report titled: Governor's Office of Planning and Research (OPR) Proposed SB743 Implementation Guidelines)



#### **Technical Improvements**

<u>Evaluation of Hazards:</u> The OPR package includes changes related to the evaluation of hazards as mandated by the California Supreme Court in *CBIA v. BAAQMD* (2015) 62 Cal.4<sup>th</sup> 369.

<u>Environmental Baseline:</u> The OPR package clarifies when it may be appropriate to use projected future conditions as the environmental baseline.

<u>Mitigation Measures:</u> The OPR package clarifies when agencies may defer specific details of mitigation measures until after project approval.

<u>Responses to Comments:</u> The OPR package proposes a set of changes related to the duty of lead agencies to provide detailed responses to comments on a project. The changes clarify that a general response may be appropriate when a comment submits voluminous data and information without explaining its relevance to the project.

Other Changes: Other proposed updates address a range of topics such as selecting the lead agency, posting notices with county clerks, clarifying the definition of "discretionary," and others. The package includes technical changes to Appendices D and E to reflect recent statutory requirements and previously adopted amendments to the CEQA Guidelines, and to correct typographical errors. Additional technical improvements include those related to pre-approval agreements, lead agency by agreement, common sense exemption, preparation of the initial study, consultation with transit agencies, citations in environmental documents, time limits for negative declarations, project benefits, joint NEPA/CEQA documents, use of the emergency exemption, discretionary projects, use of conservation easements as mitigation, and Appendices C and M to the CEQA Guidelines.

#### STATUS OF STAFF REVIEW

SCAG is appreciative of the considerations OPR has made in response to our concerns and those of the local stakeholders. SCAG staff has reviewed the proposed update to the CEQA guidelines and are mostly supportive of the proposed changes as they would facilitate the environmental review process in an efficient manner. Nevertheless, SCAG staff is in the process of drafting a comment letter in support of key topics but also asking for clarification on others (For further details, please refer to Attachment 1, Preliminary SCAG Staff Comments on Updates to CEQA Guidelines). Key topics considered for commenting are as follows:

- 1. Environmental baseline (Proposed amendments to Section 15125)
- 2. Proposed language on tiering
- 3. Promoting the use of existing regulatory standards in the CEQA process
- 4. Discussion of energy based impacts under Appendix G
- 5. Evaluating greenhouse gas impacts (Proposed amendments to Section 15064.4)
- 6. Discussion of project benefits (Proposed amendments to Section 15124)
- 7. Discussion of Wildfire Impacts under Appendix G



#### **PUBLIC REVIEW AND NEXT STEPS**

As part of its final rulemaking process, the California Natural Resources Agency has initiated a public review period for the proposed SB 743 Implementation Guidelines. The public comment period will conclude on March 15, 2018.

After the public review period was initiated, SCAG hosted a CEQA Guidelines and SB 743 Workshop on January 31, 2018 at the Caltrans District 7 offices. OPR staff provided information and answered questions regarding these regulatory modifications (For a copy of the Workshop presentation materials, please visit: <a href="http://scag.ca.gov/NewsAndMedia/Pages/Presentations.aspx">http://scag.ca.gov/NewsAndMedia/Pages/Presentations.aspx</a>). The Workshop was attended by approximately 120 participants.

SCAG will be drafting a comment letter in response to the proposed CEQA Guidelines. The comment letter will incorporate comments from SCAG staff and input received at the Workshop, as appropriate. SCAG has also requested local jurisdictions and stakeholders to provide us comments by February 28, 2018, and will incorporate their input into the comment letter, as appropriate. In addition, public hearings will be held in Los Angeles in accordance with the requirements set forth in Government Code section 11346.8. The hearing details are as follows:

Date: March 14, 2018 Time: 1:30 – 4:30 PM

Location: California Science Center

Annenberg Building

Muses Room

700 Exposition Park Dr, Los Angeles, CA 90037

For more information on the rule making process and public comment period, please visit: <a href="http://resources.ca.gov/ceqa/docs/update2018/notice-of-proposed-rulemaking.pdf">http://resources.ca.gov/ceqa/docs/update2018/notice-of-proposed-rulemaking.pdf</a>

For more information on the contents of the Proposed Update to the CEQA Guidelines, please visit OPR's website at: <a href="http://opr.ca.gov/ceqa/updates/guidelines/">http://opr.ca.gov/ceqa/updates/guidelines/</a> and California Natural Resources Agency's website at: <a href="http://resources.ca.gov/ceqa/guidelines/">http://resources.ca.gov/ceqa/guidelines/</a>

#### **FISCAL IMPACT:**

Work associated with this item is included in the Fiscal Year 17/18 Overall Work Program (080.SCG00153.04: Regional Assessment).

#### **ATTACHMENT/S:**

- 1. Preliminary SCAG Staff Comments on Updates to CEQA Guidelines
- 2. PowerPoint Presentation on Preliminary SCAG Staff Comments on Updates to CEQA Guidelines



#### **Proposed Updates to CEQA Guidelines**

#### Preliminary Staff Comments for Discussion and Input Only (2/13/18)

#### Clarification on Environmental Baseline (Proposed Amendments to Section 15125)

OPR's package proposes to amend subdivision (a) of section 15125 regarding the environmental setting. Specifically, OPR's package proposes to add a statement of purpose and three subdivisions to subdivision (a).

In the body of subdivision (a), OPR proposes to add a sentence stating that the purpose of defining the environmental setting is to give decision-makers and the public an accurate picture of the project's likely impacts, both near-term and long-term. The purpose of adding this sentence to subdivision (a) is to guide lead agencies in the choice between alternative baselines. When in doubt, lead agencies should choose the baseline that most meaningfully informs decision-makers and the public of the project's possible impacts (Page 98).

In the body of subdivision (a)(1), OPR's package sets forth a general rule: "normally, conditions existing at the time of the environmental review should be considered the baseline." However it further states that "the lead agency may describe <u>both</u> existing conditions as well as future conditions" (Page 99).

In the body of subdivision (a)(2), OPR's package sets forth the exception to the general rule and the conditions allowing lead agencies to use an alternative baseline. Subdivision (a)(2) explains that existing conditions may be omitted in favor of an alternate baseline where "use of existing conditions would be either misleading or without informative value to decision-makers and the public" (Page 99). It further clarifies that if <u>future</u> conditions are to be used, "they must be based on reliable projections grounded in substantial evidence" (Page 100).

In the body of subdivision (a)(3) OPR's package specifies that hypothetical conditions may not be used as a baseline. Specifically, the subdivision states that "lead agencies may not measure project impacts against conditions that are neither existing nor historic, such as those that might be allowed under permits or plans" (Page 100).

SCAG appreciates OPR's efforts on providing additional language with regard to baseline and base year existing conditions. There has been an on-going debate as to how agencies should properly evaluate long range plans. The updated guidelines appear to give the lead agency the freedom to choose either setting for assessing existing conditions, as appropriate.

However, further clarifications are needed for the following questions:

- If the lead agency decides to describe <u>both</u> existing and future conditions, and if future conditions resulted in less than significant impacts, whereas existing conditions resulted in significant impacts, could the lead agency override the significant impact determination under existing conditions and conclude that overall impacts would be less than significant,

- as long as they provided substantial evidence and data (i.e., regulations, modeling and emerging technology), to justify their statement?
- Additionally, is the lead agency required to mitigate for impacts under existing conditions, even though they would be unnecessary for future conditions?

#### 2. Clarification on Tiering

OPR's package proposes to amend section 15152(h) to further assist lead agencies to determine if tiering is appropriate for a given project. OPR proposes to rewrite this section that tiering is only "one of several streamlining mechanisms that can simplify the environmental review process" (Page 25). The proposed amendment states: "The rules in this section govern tiering generally. Several other methods to streamline the environmental review process exist, which are governed by the more specific rules of those provisions. Where other methods have more specific provisions, those provisions shall apply, rather than the provisions in this section. Where multiple methods may apply, lead agencies have discretion regarding which to use" (Page 27). Additionally, proposed amendments under section 15152(h) now include "infill projects (Section 15183.3)" for potential projects qualified for tiering (Page 28).

SCAG appreciates OPR including "infill projects" as potential projects qualified for tiering. Local jurisdictions who wish to tier off of their Specific Plan PEIRs or gain CEQA exemptions for Transit Oriented Development projects would highly benefit from this addition.

OPR's efforts on providing clarification for tiering and CEQA streamlining is much appreciated. Redundancy has become a major issue when conducting environmental analysis. However, it would be helpful if the CEQA guidelines were revised to describe <u>all</u> CEQA streamlining options under one unified section. Currently, CEQA streamlining and tiering is described under Section 15152, 15183, Appendix M and other sections throughout the CEQA guidelines. Streamlining the Guidelines itself would provide clarity to a project applicant.

While not applicable to the CEQA guidelines itself, it would be helpful if OPR hosted workshops with respect to CEQA streamlining and providing materials (i.e., examples, flowcharts) to lead agencies. Educating lead agencies and CEQA practitioners would facilitate the environmental review process.

#### 3. Promoting the use of existing regulatory standards in the CEQA process

OPR's package promotes the use of existing regulatory standards in the CEQA process. OPR proposes to update sections 15064 and 15064.7 to expressively provide that lead agencies may use thresholds of significance in determining significance, and that some regulatory standards may be appropriately used as thresholds of significance.

SCAG has been a proponent of using existing regulatory standards in the CEQA process and has done so for the 2016 RTP/SCS Programmatic Environmental Impact Report. We believe that using regulatory standards for determining significance would bring cohesiveness and consistency throughout the region. By doing so, not only are we able to reach statewide goals together but are able appropriately assess statewide impacts from a macro (program level) to micro (project

level) scale with ease. However, when using existing regulatory standards, it is not simply enough to state a standard and determine that a project would result in less than significant impacts, should it fall within or below the standard. The usage of regulatory standards to determine a level of significance should be fully explained and supported by adopted polices and scientific evidence within the CEQA document.

#### 4. Discussion of energy based impacts under Appendix G

OPR's package proposes to amend Section 15126.2 to discuss energy based impacts under Appendix G.

SCAG appreciates OPR's effort into integrating energy based impact discussion under Appendix G. Appendix F of the CEQA guidelines has contained guidance on energy analysis for decades but was often overlooked. Even though Appendix F was revised in 2009 to clarify that analysis is mandatory, the discussion of energy impacts was limited. SCAG believes that in order to reach our greenhouse gas emissions reduction targets for the future, it is important that we identify any wasteful energy use and identify appropriate mitigation measures to reduce emissions and to promote sustainable features for any given project.

#### 5. Updates to evaluating greenhouse gas impacts (Proposed Amendments to Section 15064.4)

OPR's package proposes to amend Section 15064.4. First, the proposed amendments clarify that a project must make a good faith effort to estimate or describe a project's greenhouse gas emissions. More importantly, the focus of the lead agency's analysis should be on the project's effect on climate change (Page 87). This clarification is necessary to avoid an incorrect focus on the quantity of emissions, and in particular how that quantity of emissions compare to global emissions (Page 88). OPR's package further clarifies that lead agencies should consider the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change (Page 88). Second, the proposed amendments clarify that lead agencies should consider a timeframe for the analysis that is appropriate for the project, due to the fact that in some cases, it would be appropriate for agencies to consider a project's long-term greenhouse gas impacts, such as for projects with long time horizons for implementations (Page 88). Third, the proposed amendments clarify that an agency's analysis must reasonably reflect evolving scientific knowledge and state regulatory schemes (Page 88). Fourth, the proposed amendments clarify that an agency's analysis may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change (Page 89).

SCAG supports OPR's proposed amendments on evaluating greenhouse gas impacts. As mentioned previously, it is important that we work towards reducing emissions. In the past, when greenhouse gas emissions were evaluated, emissions were often analyzed with little or no mention of climate change. Proposed changes would ensure that we focus on a projects contribution (or no contribution) to climate change, thereby allowing us to quantify our distance to the region's greenhouse gas emissions target goals. SCAG agrees that an appropriate

timeframe setting is important when evaluating greenhouse gas emissions. Projects that have significant development or operational periods and have potential to emit significant amount of greenhouse gas emissions, should have a level of analysis that captures a longer timeframe as it allows us to determine if we can achieve long term State targets in reducing greenhouse gas emissions.

SCAG also agrees that an agency's analysis must reasonably reflect evolving scientific knowledge and state regulatory schemes. The purpose of a CEQA document is to fully inform the public and decision makers on a project's potential impacts. Therefore, it is important that when conducting CEQA documentation, agencies should make the best effort to use the best data and modeling tools available. This is highly critical as scientific research and knowledge is a dynamic process, which is continuously evolving rather than a static one. It is also important that discussion and analysis revolves around existing and new regulatory standards that are and were codified during the preparation of the environmental document. As referenced before, should an agency decide to use regulatory standards as a threshold for significance, standards should be fully explained and supported by adopted polices and scientific evidence within the CEQA document.

Since the enactment of Executive Orders B-16-2012, B-30-15, S-3-04, Assembly Bill 32 and the codification of Senate Bill 32, there has been an on-going debate as to how to appropriately analyze greenhouse gas emission impacts, particularly cumulative impacts. Greenhouse gas emissions by nature are "global", as opposed to localized with respect to cumulative impacts. To clarify, greenhouse gas emission impacts are not confined within the boundaries of a project area, a city or even a state, but contribute to a global inventory by nature, thus making it difficult to analyze within CEQA as it hard to bridge the gap of analysis for a local project (i.e. manufacturing factory, small refinery, or retail projects) and it's impacts on the state or the entire world. SCAG requests that OPR work with MPOs and local jurisdictions to develop a sound roadmap as to how to properly analyze cumulative greenhouse gas emission impacts, in an effort to facilitate the CEQA process, minimize litigation and to achieve statewide targets.

#### 6. Discussion of Project Benefits (Proposed Amendments to Section 15124)

OPR's package proposes to amend subdivision (b) of Section 15124. Currently, subdivision (b) states that a project description shall include a statement of objectives sought by the project. The proposed language has been revised to state: "The statement of objectives should include the underlying purpose of the project and may discuss the project benefits" (Page 152).

SCAG supports the proposed amendments to Section 15124. Allowing a discussion of project benefits within the project description would be beneficial to lead agencies. Previously, project benefits have been discussed solely within the Findings of Facts and Statement of Overriding Considerations Section within the Final Environmental Impact Report. Unfortunately, this section is highly overlooked from the general public. As such, readers often do not understand as to why a certain project is being developed and will often focus on the environmental impacts, thus creating a negative bias. By describing the project benefits up front, the reader will be offered a more balanced perspective, prior to making their decision.

#### 7. Discussion of Wildfire Impacts under Appendix G

OPR's package proposes to amend Appendix G by adding the discussion of wildfires as one of its primary environmental topics.

SCAG supports proposed amendments to Appendix G, allowing for a discussion of wildfire impacts. Over the past decades, the State of California has experienced a multitude of wildfires. The wildfires of 2017 were considered the most destructive fire events in California's history. According to the California Department of Forestry and Fire Protection, a total of 9,133 fires burned through 1,381,405 acres, which resulted in an economic toll of at least \$180 billion. As such, it is clear that a discussion revolving around wildfire impacts is greatly needed. The discussion of wildfire impacts will beneficial, as it will potentially inform the general public about potential wildfire risks. Additionally, should any potential risks or impacts be identified, appropriate mitigation measures to minimize such hazards would be developed.



## **Proposed Updates to the State CEQA Guidelines**

## **Preliminary Staff Comments for Discussion**

SCAG Energy and Environment Committee
March 1, 2018

Roland Ok Senior Regional Planner Southern California Association of Governments



## Proposed Updates to the State CEQA Guidelines

- OPR transmitted the proposed CEQA Amendments to the California Natural Resources Agency (November 27, 2017)
- Key updates focus on Efficiency, Substantive and Technical Improvements
- SCAG will be drafting a comment letter in response to the proposed updates to the State CEQA Guidelines
- We encourage your input into the content & focus of the letter

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## **Overview of Updates**

#### Efficiency

 Regulatory Standards, Updates to Appendix G, Tiering and CEQA exemptions

#### Substantive

 Energy, Water Supply, Transportation, and Greenhouse Gas Emissions Analysis

#### Technical

 Evaluation of Hazards, Environmental Baseline, Mitigation Measures

### **Status of Staff Review**

- SCAG hosted a CEQA Guidelines Update/SB 743 Workshop on January 31<sup>st</sup> at Caltrans District 7, attended by about 120 participants
- Comments & feedback received at the Workshop will be incorporated into SCAG comment letter, as appropriate
- SCAG has assembled a preliminary list of staff comments for discussion & input
- We seek the counsel & feedback of this committee on these initial comments
- Our final comment letter will submitted to the Natural Resources Agency following their Public Hearing on March 14<sup>th</sup>

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#### Clarification on Environmental Baseline

• The proposed update clarifies when it may be appropriate to use project future conditions as the environmental baseline.

#### SCAG's preliminary response

- SCAG appreciates OPR's effort's on providing additional language with regards to baseline and base year existing conditions.
- If the lead agency decides to describe both existing and future conditions, but each scenario resulted in opposite impacts, could the lead agency override the significant impact determination under existing conditions and conclude that overall impacts would be less than significant?

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## **Preliminary Staff Comments**

#### Clarification on Tiering

• The proposed update includes several changes to clarify the rules on tiering and includes several changes to make the existing programmatic environmental review process easier for lead agencies. Also includes "infill projects" for projects potential projects qualified for tiering.

#### SCAG's preliminary response

- SCAG is appreciative with OPR's efforts on providing clarification for tiering and CEQA streamlining in general.
- However, it would be helpful if the CEQA guidelines itself were revised to describe all CEQA streamlining options under one unified section.
- It would also be helpful if OPR hosted workshops with respect to CEQA streamlining.

- Promoting the use of existing regulatory standards in the CEQA Process
  - The proposed update promotes the use of existing regulatory standards as a threshold for determining significance.
- SCAG's preliminary response
  - SCAG is a proponent of using existing regulatory standards in the CEQA process and has done so for the 2016 RTP/SCS PEIR.
  - Usage of regulatory standards should be fully explained and supported by adopted policies and scientific evidence.

## **Preliminary Staff Comments**

- Discussion of energy based impacts under Appendix G
  - The proposed update proposes to amend Section 15126.2 to discuss energy based impacts under Appendix G
- SCAG's preliminary response
  - SCAG supports OPR's effort into integrating energy based impact discussion under Appendix G.
  - In the past, the discussion of energy based impacts was under Appendix F, and while mandatory, was often overlooked.

#### Discussion of energy based impacts under Appendix G

• The proposed update includes updates related to the analysis of impacts from greenhouse gas emissions and clarifies that the lead agency's analysis should focus on the project's effect on climate change.

#### SCAG's preliminary response

- SCAG agrees that the analysis should focus on a project's effect on climate change, in an effort to provide context.
- SCAG requests that OPR work with MPOs and local jurisdictions to develop a sound roadmap as to how to properly analyze cumulative greenhouse gas emission impacts, in an effort to facilitate the CEQA process, minimize litigation and to achieve statewide targets.

## **Preliminary Staff Comments**

#### Discussion of Project Benefits

• The proposed update revises language under Section 15124 to state "The statement of objectives should include the underlying purpose of the project and may discuss project benefits".

#### SCAG's preliminary response

- SCAG supports the proposed amendments. Allowing a discussion of project benefits within the project description would be beneficial to lead agencies. Previously, project benefits have been discussed solely towards the end of the PEIR (Findings of Facts and Statement of Overriding Considerations), and are often overlooked.
- A discussion of benefits up front, will give the reader a balanced perspective.

- Discussion of Wildfire Impacts under Appendix G
  - OPR's package proposes to amend Appendix G by adding the discussion of wildfires as one of its primary environmental topics.
- SCAG's preliminary response
  - SCAG supports proposed amendments to Appendix G, allowing for a discussion of wildfire impacts.
  - In 2017, a total of 9,133 fires burned through 1,381,405 acres, which resulted in an economic toll of at least \$180 billion.
  - The discussion of wildfire impacts will be beneficial, as it will potentially inform the general public about potential wildfire risks. Additionally, should any potential risks or impacts be identified, appropriate mitigation measures to minimize such hazards would be developed.

### **Next Steps**

- SCAG encourages local jurisdictions to submit your own comment letters to the Natural Resources Agency to express concerns specific to your community.
- The California Natural Resources Agency will be conducting a Public Hearing at the California Science Center on Wednesday, March 14<sup>th</sup> from 1:30-4:30pm.
- The Public Hearing provides a valuable opportunity to express concerns & questions directly to the agency responsible for finalizing the rule.
- Once the Natural Resources Agency reviews comments received & makes any changes (if necessary), the proposal goes to the Office of Administrative Law for final adoption.

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## Thank you!

http://opr.ca.gov/ceqa/updates/guidelines/

Roland Ok (213) 236-1819 ok@scag.ca.gov







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

Agenda Item No. 4 March 1, 2018

**To:** Community, Economic and Human Development Committee

(CEHD)

EXECUTIVE DIRECTOR'S APPROVAL

Hosas Wehath

From: Jason Greenspan, AICP, Sustainability Department Manager,

213-236-1859, greenspan@scag.ca.gov

**Subject:** Affordable Housing & Sustainable Communities (AHSC):

SCAG Application Review

#### **RECOMMENDED ACTION:**

Receive and File - No Action Required

## **EXECUTIVE SUMMARY:**

The California Strategic Growth Council (SGC) has outlined certain roles for Metropolitan Planning Organizations (MPOs) in the Affordable Housing and Sustainable Communities (AHSC) program. One role is the option to evaluate and provide a prioritized list of submitted projects from an MPO's region. Given the limited information available from SGC on how a prioritized project list would be applied, SCAG staff plans to forgo any project ranking and instead submit a broad letter in support of all projects.

## **STRATEGIC PLAN:**

This item supports SCAG's Strategic Plan, Goal 2: Advance Southern California's policy interests and planning priorities through regional, statewide, and national engagement and advocacy.

# **BACKGROUND:**

The AHSC Program seeks to incentivize production of affordable housing with supportive transit service and non-vehicular infrastructure in urban, suburban and rural settings. Higher-density, infill developments that effectively support transportation mode shift from single-occupancy vehicles to transit, bicycling, walking and shared-mobility are prioritized for funding. The program receives continuous appropriations from the Greenhouse Gas Reduction Fund (GGRF), with revenue derived from the State's cap and trade auctions. Projects must therefore demonstrate a quantifiable and substantial reduction in greenhouse gas (GHG) emissions.

In the first two competitive AHSC rounds (2015-2016), a total 19 projects were funded in the SCAG region by SGC that will result in the construction of over 1,655 affordable housing units in Long Beach, Los Angeles, Riverside, and Santa Ana. During 2016 and 2017 SCAG conducted numerous workshops throughout the region to explain the purpose of the program; connect with stakeholders including



local jurisdictions, transit providers, builders and nonprofits; and support capacity building for future successful projects. SCAG also provided technical assistance and direct application support when requested by project sponsors.

Senate Bill 862 authorized the AHSC program to receive 20% of ongoing GGRF proceeds and included a clause that "The council shall coordinate with the metropolitan planning organizations and other regional agencies to identify and recommend projects within their respective jurisdictions that best reflect the goals and objectives of this division." To date, this coordination has included MPO involvement in guideline revisions, the provision of technical assistance by MPOs, and MPO review of applications for SCS consistency. SCAG has continued to participate in these activities. One additional opportunity for MPO coordination is through optional project evaluation and prioritization.

In April 2015, at SGC's request, evaluation criteria were developed and approved by the Regional Council based on 2012 RTP/SCS strategies. These 2012 strategies and associated evaluation criteria are no longer applicable. For the current round of funding, AHSC Round 3, MPOs are being given the option to evaluate and prioritize applications by the beginning of April 2018. Without further guidance from SGC on the methodology they intend to use for informing the awards selection, it is unclear how SCAG should prioritize projects without potentially inadvertently disadvantaging potential projects compared to other regions. In general, all submitted projects help to implement the 2016 RTP/SCS and SCAG has provided letters verifying SCS consistency to all AHSC applicants. Considering the lack of guidance from SGC, staff has concluded that developing new evaluation criteria is inadvisable.

# **Staff Proposal**

Staff proposes to forgo project ranking for this round so as to not inadvertently disadvantage potential projects. As part of the application process, SCAG has already provided letters to each applicant stating that the proposed project supports implementation of our Sustainable Communities Strategy. Instead of ranking the submitted projects, SCAG intends to send a broad letter to SGC reiterating our support of <u>all</u> projects based on their implementation of our 2016 RTP/SCS. SGC plans to announce recommended awards by June 2018. SCAG staff will continue to engage with SGC staff on coordinating project evaluations for future funding rounds.

FISCAL	IMPACT:
None	

\_\_\_\_

# **ATTACHMENT/S:**

None





Southern California Association of Governments 900 Wilshire Blvd., Suite 1700, Los Angeles, CA 90017 CEHD Agenda Item No. 5 March 1, 2018

Community, Economic & Human Development Committee Proposed Topic Outlook July 2017 – June 2018

MONTH / YEAR	PROPOSED TOPICS
July 2017	Proposition 64: The Impact of Cannabis Legalization in California on Local Land Use and Zoning
August 2017	[DARK]
September 2017	Homelessness
October 2017	Yes in My Backyard (YIMBY) and Local Housing Advocacy
November 2017	Safety, Land use and Urban Design
December 2017	Education and Career Partnerships with Local Communities
January 2018	[DARK]
February 2018	Cannabis Legalization Regulations and Local Land Use
March 2018	Decision-making: Historical Preservation in Face of Pressure for Commercial Revitalization
April 2018	Human Trafficking
May 2018	General Assembly [DARK]
June 2018	Youth Crime Prevention Programs





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

Agenda Item No. 6 March 1, 2018

**EXECUTIVE DIRECTOR'S** 

**APPROVAL** 

Hosas Wehath

**To:** Energy and Environment Committee (EEC)

Community, Economic and Human Development (CEHD)

Transportation Committee (TC)

Regional Council (RC)

From: Mike Gainor, Senior Regional Planner, 213-236-1822,

gainor@scag.ca.gov

Subject: Office of Planning and Research Proposed

SB 743 Implementation Guidelines

# RECOMMENDED ACTION FOR CEHD, EEC & TC:

For Information Only - No Action Required

## **RECOMMENDED ACTION FOR RC:**

Receive and File.

# **EXECUTIVE SUMMARY:**

On November 27, 2017, the Governor's Office of Planning and Research (OPR) transmitted the final proposed Senate Bill 743 (SB 743) Implementation Guidelines to the California Natural Resources Agency for final rulemaking. OPR's final proposal reflects and incorporates substantial input provided by a wide array of statewide stakeholders, including metropolitan planning organizations (MPOs), County Transportation Commissions, local implementation agencies, and environmental advocacy organizations. Since the time SB 743 was signed by the Governor in 2013, OPR has provided multiple forums for stakeholder discussion and various opportunities for input and comment into how the new law should be implemented. SCAG has worked closely and cooperatively with OPR throughout this process.

The final rulemaking process now being conducted by the California Natural Resources Agency allows for an additional opportunity for public review and comment. The Natural Resources Agency has established a public comment period which will end on March 15, 2018. SCAG will be drafting a comment letter in response to the proposed SB 743 Implementation Guidelines. We encourage input from our local jurisdictions and stakeholders as to the letter's final content and focus.

To provide current information to our local stakeholders, SCAG hosted a CEQA Guidelines and SB 743 Workshop on January 31, 2018 at the Caltrans District 7 offices. Comments and feedback received at the Workshop will be incorporated into SCAG's draft comment letter, as appropriate.



#### **STRATEGIC PLAN:**

This item supports SCAG's Strategic Plan Goal 2: Advance Southern California's policy interests and planning priorities through regional, statewide, and national engagement and advocacy.

## **BACKGROUND:**

The California Environmental Quality Act (CEQA) requires public agencies, as part of the project approval decision-making process, to evaluate and mitigate (as needed) a project's potential environmental impacts. OPR is charged with developing the administrative regulations to implement CEQA, and the Natural Resources Agency adopts those regulations following a formal rulemaking process. Among the analyses required by CEQA is a transportation impact analysis.

In response to the passage of SB 743, OPR initiated a process to update the transportation impact analysis language in the CEQA Guidelines and to develop a corresponding 'Technical Advisory' to provide methodological assistance and implementation recommendations for local agencies. Last November, OPR transmitted its final proposed SB 743 Implementation Guidelines to the California Natural Resources Agency for final rulemaking.

# PROPOSED UPDATES TO THE SB 743 IMPLEMENTATION GUIDELINES

SB 743 charged OPR with the task of updating the CEQA Guidelines to emphasize current State planning priorities, including the reduction of greenhouse gas (GHG) emissions, streamlining infill and mixed-use transit-oriented development, and facilitating active transportation and transit improvement projects. The final OPR proposal contains several key revisions from the previous draft CEQA Guidelines and Technical Advisory proposal released in January, 2016.

The final proposed SB 743 Implementation Guidelines include several key revisions to the CEQA Guidelines:

<u>Transportation Impact Analysis:</u> The proposed final SB 743 Implementation Guidelines includes significant changes related to the analysis of CEQA transportation impacts. SB 743 required OPR to develop an alternative methodology to replace the existing 'Level of Service' (LOS) analysis for evaluating CEQA transportation impacts. The proposed OPR update designates vehicle miles travelled (VMT) as the most appropriate metric for evaluating transportation impacts for most projects. VMT was selected by OPR as the preferred methodology to replace LOS because of its potential value in facilitating transit-oriented projects in existing urbanized areas and for encouraging bicycle and pedestrian improvements in mixed use urban centers.

Among the guiding principles of SB 743 were to encourage infill development, facilitate the use of active transportation, and reduce greenhouse gas (GHG) emissions. The adoption of a VMT-based metric eliminates the exclusive focus on automobile delay as the primary parameter for evaluating CEQA transportation impacts as was the focus of LOS analysis. Transportation impact analysis based on VMT will improve the viability of infill and transit-oriented development projects, as well as other projects that serve to reduce GHG emissions through decreased dependency on single occupancy vehicles and increased use of active transportation and transit options.



<u>VMT Implementation Changes:</u> The final version of the proposed SB 743 Implementation Guidelines includes some significant revisions from the previous draft proposal released by OPR in January, 2016. These modifications are primarily related to implementation of the VMT methodology and were developed largely in response to concerns expressed by local implementation agencies and other statewide stakeholders. These proposed implementation changes include:

- Use of the VMT methodology for evaluating CEQA transportation impacts is now optional for highway capacity projects.
- Analysis of freight VMT is no longer required.
- Only the number of residential units prescribed in the Sustainable Communities Strategy (SCS) may be used to reference the average VMT for a city.
- Mixed-use development projects may limit VMT-based transportation impact analysis only to the predominant land use.

#### STATUS OF STAFF REVIEW

SCAG staff has reviewed the proposed final SB 743 Implementation Guidelines and Technical Advisory, and are appreciative of the considerations OPR has made in response to our concerns and those of our local stakeholders, most notably for the provision for added flexibility in the use of VMT analysis for transportation capacity improvement projects. Staff will continue its review and will also consider comments received at the workshop described further below. Throughout the more than four years since the passage of SB 743, OPR has collaborated closely with SCAG and the other state MPOs to ensure that implementation of this ground-breaking new law will be implemented with minimal added burden to our local jurisdictions. Please refer to Attachment #1 for a preliminary draft list of SCAG staff comments regarding the proposed SB 743 implementation guidelines.

## **PUBLIC REVIEW AND NEXT STEPS**

As part of its final rulemaking process, the California Natural Resources Agency has initiated a public review period for the proposed SB 743 Implementation Guidelines. The public comment period will conclude on March 15, 2018.

To provide information to our regional stakeholders in regard to this important rulemaking, SCAG hosted a CEQA Guidelines and SB 743 Workshop on January 31, 2018 at the Caltrans District 7 offices. OPR staff provided information and answered questions regarding the proposed regulatory modifications. The Workshop was attended by approximately 120 participants.

For a copy of the CEQA Guidelines/SB 743 Workshop presentation materials, please visit: <a href="http://scag.ca.gov/NewsAndMedia/Pages/Presentations.aspx">http://scag.ca.gov/NewsAndMedia/Pages/Presentations.aspx</a>

SCAG will be drafting a comment letter in response to the proposed SB 743 implementation guidelines. The comment letter will incorporate comments from SCAG staff and input received at the Workshop, as appropriate. SCAG has also requested local jurisdictions and regional stakeholders to



provide comments to us by February 28, 2018. Comments received by that date will be incorporated into the SCAG comment letter, as appropriate.

The California Natural Resources Agency will be conducting a public hearing in Los Angeles on March 14<sup>th</sup> at the following time and location:

Date: Wednesday, March 14, 2018

Time: 1:30 - 4:30 PM

Location: California Science Center

**Annenberg Building** 

**Muses Room** 

700 Exposition Park Drive, Los Angeles, CA 90037

For more information on the rule-making process and public comment period, please visit: http://resources.ca.gov/ceqa/docs/update2018/notice-of-proposed-rulemaking.pdf

# **FISCAL IMPACT:**

Work associated with this item is included in the Fiscal Year 17/18 Overall Work Program (080.SCG00153.04: Regional Assessment).

# **ATTACHMENT/S:**

- 1. Draft SCAG Comments Regarding Proposed SB 743 Implementation Guidelines
- 2. Powerpoint Presentation

# **Proposed SB 743 Implementation Guidelines**

# Preliminary Staff Comments for Discussion & Input Only (2/15/18)

- SCAG appreciates the efforts that the Office of Planning and Research (OPR) staff have made over the past four years to ensure that the process of guidelines development for the implementation of SB 743 are as inclusive and participatory as possible. On numerous occasions, OPR staff have reached out, in a meaningful manner, to obtain feedback and input from stakeholders throughout the state. In collaboration with OPR staff, SCAG has hosted six stakeholder workshops during the guidelines development process to receive input.
- 2. It is clear that this ground-breaking legislative initiative will have far-reaching impacts on the way land use and transportation planning is conducted throughout California, and it has been critical that the concerns and feedback of our regional partners and implementing agencies be heard and addressed throughout this extended process. OPR has demonstrated generosity of their staff time and resources to ensure that the implementation of these new regulations are successful, without placing an undue burden on implementing agencies.
- 3. One major modification provided by OPR in its final proposal was to make VMT analysis for highway capacity projects optional rather than required. This significant accommodation was made in direct response to the expressed concerns of many of our regional stakeholders. Highway capacity improvement projects that are already included in the adopted SCAG RTP/SCS are critical to our region's long-term mobility objectives, and collectively contribute to the Plan's overall regional sustainability and climate goals.
- 4. The proposed VMT-based analysis for the assessment of potential transportation impacts pursuant to SB 743 is of great interest to SCAG and to our local jurisdictions and stakeholders. SCAG believes that the proposed methodological change, from the previously used 'Level of Service' (LOS) analysis, will ultimately serve to enhance the ability of our state and our region to achieve our GHG reduction goals, while still preserving our critically needed regional mobility investments.
- 5. It is critical that lead agencies be provided sufficient time to adequately prepare for the methodological changes that will be required through implementation of SB 743. The currently targeted implementation date of January 1, 2020, as prescribed in the proposed new Guidelines Section 15064.3 (c) entitled 'Applicability', should be revised to allow for a full two-year implementation opt-in period from the effective date of the final rule-making.
- 6. The proposed regulatory text provided on the California Natural Resources website indicates a statewide implementation effective date of July 1, 2019 (page 11, Section (c) entitled, 'Applicability'). This inconsistency should be corrected.

- 7. Since these regulations represent a substantial change in methodology from previously used CEQA transportation impact analysis processes, it is critical that, after rule adoption, the state provide additional implementation assistance and guidance opportunities to our local jurisdictions for enacting the new procedures at the local level. The establishment of a set of best practices for implementation of the new methodology over a variety of settings and project types will assist lead agencies to evaluate and anticipate potential impacts of their planned projects. SCAG has already engaged with other MPOs in this direction and looks forward to assisting OPR in this effort.
- 8. The Technical Advisory states that if a local jurisdiction uses city VMT per capita, the "Proposed development referencing city VMT per capita must not cumulatively exceed the number of units specified in the SCS for that city, and must be consistent with the SCS." (Technical Advisory, Page 12, 'Recommended Numeric Thresholds for Residential, Office, and Retail Projects', November, 2017). Since total number of housing units is not a variable in SCAG's growth forecasts, it is not included in the adopted SCS. SCAG uses the variable of "households", or occupied housing units, which is a slightly smaller subset of housing units, depending upon the vacancy factor. Therefore, there is no number of units inventory for a local jurisdiction in SCAG's SCS from which to make a determination as to whether or not a proposed project exceeds the number of units specified in the SCS. We request that OPR clarify this methodological ambiguity in the SB 743 guidelines.

# Proposed SB 743 Implementation Guidelines

# **Preliminary Staff Comments for Discussion**

SCAG Regional Council Committees
March 1, 2018

Mike Gainor
Senior Regional Planner
Southern California Association of Governments



# Proposed SB 743 Implementation Guidelines

- OPR has transmitted its final proposed SB 743 Implementation Guidelines to the Natural Resources Agency for final rulemaking
- The final OPR proposal reflects & incorporates substantial input provided by a wide array of stakeholders, including SCAG
- A public comment period, now underway, will conclude on March 15th
- SCAG will be drafting a comment letter in response to the proposed SB 743 Implementation Guidelines
- We encourage your input into the content & focus of the letter

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# Proposed SB 743 Implementation Guidelines

- SCAG hosted a CEQA Guidelines Update/SB 743 Workshop on January 31st at Caltrans District 7, attended by about 120 participants
- Comments & feedback received at the Workshop will be incorporated into SCAG comment letter, as appropriate
- SCAG has assembled a preliminary list of staff comments for discussion & input
- We seek the counsel & feedback of this committee on these initial comments
- Our final comment letter will submitted to the Natural Resources Agency following their Public Hearing on March 14<sup>th</sup>

# **Preliminary Staff Comments**

- SCAG appreciates the efforts OPR staff have made over the past 4 years to ensure that the SB 743 implementation guidelines development process was as inclusive & participatory as possible.
- OPR staff have reached out, on numerous occasions & in various formats, to obtain feedback & input from statewide & regional stakeholders.
- SCAG has collaborated with OPR staff to host 6 stakeholder workshops during the guidelines development process to receive input.
- SB 743 will have far-reaching impacts on how land use & transportation planning is conducted in California & it was critical that the concerns of our region were heard & addressed throughout the development process.

2

# **Preliminary Staff Comments**

- One major modification provided by OPR in its final proposal was to make VMT analysis for highway capacity projects optional rather than required.
- This important accommodation was made in response to the expressed concerns of many of our regional stakeholders.
- Highway capacity projects already included in the adopted SCAG RTP/SCS are critical to our region's long-term mobility objectives, & collectively contribute to the Plan's overall regional sustainability & climate goals.
- The revised OPR proposal will serve to enhance the ability of our state & our region to achieve our GHG reduction goals, while still preserving our critically needed regional mobility investments.

5

# **Preliminary Staff Comments**

- It is critical that lead agencies be provided sufficient time to adequately prepare for the significant methodological changes that will be required through implementation of SB 743.
- The currently targeted implementation date of January 1, 2020 should be modified to allow for a full two-year implementation opt-in period from the effective date of the final rule-making.
- Since these regulations represent a substantial change in methodology from previously used analytical processes, it is critical that, after rule adoption, the state provide additional implementation assistance to our local jurisdictions for enacting the new procedures at the local level.

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# **Next Steps**

- SCAG encourages local jurisdictions to submit your own comment letters to the Natural Resources Agency to express concerns specific to your community.
- The California Natural Resources Agency will be conducting a Public Hearing at the California Science Center on Wednesday, March 14<sup>th</sup> from 1:30-4:30pm.
- The Public Hearing provides a valuable opportunity to express concerns & questions directly to the agency responsible for finalizing the rule.
- Once the Natural Resources Agency reviews comments received & makes any changes (if necessary), the proposal goes to the Office of Administrative Law for final adoption.

# Thank you!

http://opr.ca.gov/ceqa/updates/guidelines/

Mike Gainor (213) 236-1822 gainor@scag.ca.gov





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

Agenda Item No. 7 March 1, 2018

To: Community, Economic and Human Development (CEHD)

Committee

EXECUTIVE DIRECTOR'S

APPROVAL

Hosas Wehath

From:

Ma'Ayn Johnson, Housing & Land Use Planner,

213-236-1975, johnson@scag.ca.gov

Subject: Mobile Home Parks as a Source of Affordable Housing

#### **RECOMMENDED ACTION:**

For Information Only - No Action Required

# **EXECUTIVE SUMMARY:**

Mobile home parks are a potentially feasible source of affordable housing for a number of jurisdictions. However, the unique circumstance of their tenant-owner relationship can contribute to their vulnerability given their risks from increasing rent and conversions. To preserve their affordability, jurisdictions can consider rent stabilization ordinances and encourage a limited equity cooperative model.

# STRATEGIC PLAN:

This item supports SCAG's Strategic Plan; Goal 2: Advance Southern California's policy interests and planning priorities through regional, statewide, and national engagement and advocacy; Objective A: Cultivate dynamic knowledge of the major challenges and opportunities relevant to sustainability and quality of life in the region.

#### **BACKGROUND:**

As a part of many communities throughout California, mobile home parks can serve as a valuable source of affordable housing. In a typical mobile home park a mobile home, also known as a manufactured home, is owned by the occupant but the plot of land that the mobile home occupies in the park is owned by another entity or individual. Residents are subject to the rental agreement or lease in which they reside. Usually the park owner hires a manager or management company to operate and maintain the park.

While the U.S. Department of Housing and Urban Development has established safety standards for new manufactured homes, issues relating to mobile home park management, rental agreements, rent increases, and tenancies are governed by California Civil Code and Health and Safety Code unless specifically indicated by local ordinance. Mobile homes and mobile home parks are extensively regulated by state law. Moreover, despite the name "mobile", once installed most mobile homes are



never moved but are resold in place in the park due to the expense of moving the unit and availability of spaces elsewhere<sup>1</sup>.

Manufactured homes outside mobile home parks can also serve as a source of affordable housing. Owners can save on the cost of construction compared to a home built from unassembled materials on-site, resulting in a lower home costs. However, this staff report will focus on mobile homes inside designated mobile home parks as a source of affordable housing due to the high costs of vacant land, particularly in Southern California.

#### Costs

The average sale price a new manufactured home in the Western United States in 2017 was between \$90,000 and \$100,000, though larger homes with two sections averaged between \$100,000 and \$116,000<sup>2</sup>. Although used manufactured homes are also available for sale already located in a mobile home park space, their prices are usually appraised in the same way as a site-built home and take into consideration factors such as the site itself, square footage, and condition along with recent sales<sup>3</sup>.

Similar to other types of housing, the cost to rent a space in a mobile home park will vary by location and amenities offered. A cursory glance at space rent comparisons reveals a wide range of monthly fees. For example, in the City of Corona in Riverside County, monthly rents ranging from \$470 to \$1,300 were found, while in the City of Santa Clarita in Los Angeles County rents found ranged as low as \$500 to over \$1,500<sup>4</sup>. In comparison, the median rent in 2016 for the City of Corona and the City of Santa Clarita were \$1,417 and \$1,653, respectively<sup>5</sup>.

In terms of taxation, mobile homes manufactured and sold prior to July 1980 are subject to an annual State vehicle license fee. Mobile homes manufactured after July 1980 or those permanently fixed to the land are subject to local property taxes. In newly developed parks, new buyers may also have to pay school impact fees or other locally imposed fees, similar to site-built residential units.

## SCAG Region

In California, there are over 5,200 mobile home parks representing over 364,000 lots and approximately 700,000 residents. Within the SCAG region, there are over 1,700 mobile home parks representing over 157,000 lots. 7

<sup>&</sup>lt;sup>1</sup> "What Every Mobile Home Owner Should Know," City of Hemet, CA, https://www.cityofhemet.org/DocumentCenter/View/3045 (2015)

<sup>&</sup>lt;sup>2</sup> "Manufactured Housing Survey," U.S. Census, https://www.census.gov/programs-surveys/mhs.html (2017)

<sup>&</sup>lt;sup>3</sup> "What is the Right Price for a Used Mobile Home?" McGarry & Madsen, http://www.mcgarryandmadsen.com (2015)

<sup>4 &</sup>quot;Space Rent Comparisons," Mobile Home Park Home Owners Allegiance, https://mhphoa.com/ca/rent/

<sup>&</sup>lt;sup>5</sup> "2016 ACS 5-Year Estimates, Housing Financial Characteristics," U.S. Census, https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS\_16\_5YR\_S2503&prodType=table (2016)

<sup>&</sup>lt;sup>6</sup> California Housing and Community Development Department, January 2018

<sup>&</sup>lt;sup>7</sup> California Housing and Community Development Department, January 2018



County	Parks		Lots/Spaces	
	2008	2018	2006	2018
Imperial	79	73	3,077	2,962
Los Angeles	644	595	48,683	47,937
Orange	219	214	28,799	28,739
Riverside	350	343	34,494	34,551
San Bernardino	381	375	32,053	32,372
Ventura	102	101	10,489	10,468
Total	1,775	1,701	157,595	157,029

Over the past decade, the region as a whole has lost 74 mobile home parks, or about 4 percent of its total. In terms of unit spaces lost, 566 spaces have been lost since 2006, representing a 4 percent decrease from the SCAG region. While the majority of SCAG counties have had a decrease in the number of available mobile home park spaces, it is noteworthy to mention that the number of spaces in both Riverside and San Bernardino Counties have *increased*.

Due to their relatively low cost in comparison to fixed housing units, mobile home parks can be another way to address the housing crisis at the municipal level. Similar to senior-only residential complexes, mobile home parks can also be designated as senior-only housing facilities where residents or a substantial number of residents are fifty-five (55) years or older. This can particularly help meet the need for affordable housing for communities that have a growing percentage of senior citizens that are on fixed or limited incomes.

#### Drawbacks

Due to their relatively fixed setup, households living in mobile homes may find themselves in a situation where they own their unit but can no longer afford the rent on the space their unit occupies due to rent increases. Landlords of the mobile home tenants must give a 90-day advance written notice of a rent increase but unless there is a local ordinance, there is no regulation on rent increase for mobile home parks. Moreover, in a 12 month period, tenants can only be late three times before a park owner may use late rent as a reason for eviction<sup>8</sup>.

Additionally, mobile home parks are at risk for conversion. In the face of the increasing land values and development pressure, some parks are converting to other uses and in many cases, the parks are converted to subdivided resident-owned developments that affect their affordability. For conversions certain requirements must be met, such as resident first-rights of purchase, resident surveys, and public hearings. However, while a few jurisdictions in California have attempted to add conditions to conversions, courts have consistently struck down these additional requirements in part because of the preemptive nature of the state laws that govern mobile home parks.

<sup>&</sup>lt;sup>8</sup> "California Mobile Home Residency Law (CAMRL) and Leasing a Mobile Home Park," NewPoint Law Group, LLC, http://newpointlaw.com/california-mobile-home-residency-law-camrl-and-leasing-a-mobile-home-park/ (2016)



## **Possible Solutions**

To address these issues while still encouraging mobile home parks as an affordable housing tool, jurisdictions should explore different approaches and determine whether it will be a good fit. Similar to addressing the statewide housing crisis, there is no "one-size-fits-all" approach.

The vulnerability of mobile home park residences to arbitrary rent increases may warrant a need for a local rent stabilization ordinance, also known as rent control. Over thirty-five (35) SCAG jurisdictions have some form of a rent stabilization ordinance for mobile home parks, though most of them do not have a rent stabilization ordinance for conventional residential units. These ordinances vary how much rents may increase and how the increases are decided<sup>9</sup>.

Another approach is to encourage a limited equity cooperative model ("co-op"), in which each unit owner owns a pro-rated share in a resident corporation that owns the entire mobile home park. In this situation, co-op members are considered both lessees and owners, allowing for residents to determine their own rent increases and tenancies. Accomplishing this is difficult and expensive, however there is a small number of funding sources available to finance this. The California Department of Housing and Community Development (HCD)'s Mobilehome Park and Rehabilitation and Resident Ownership Program (MPRROP) is set up to finance the preservation of affordable mobile home parks by conversion to ownership or control by resident organizations, nonprofit housing sponsors, or local public agencies. The MPRROP offers short and long term loans to eligible organizations and local agencies for rehabilitation of a park, purchase by a low-income resident of a share or space in a converted park, or for the cost of repair to a low-income resident's mobile home. A jurisdiction can encourage low income mobile home park residents vulnerable to increasingly unaffordable rents to consider organizing into a cooperative model to preserve affordability of these units.

As the housing crisis continues to worsen, it is important that jurisdictions consider multiple angles when assessing potential solutions for their community. While encouraging mobile home parks and supportive tools to maintain their affordability may work in a number of communities, these same tools may not be feasible in others. The housing crisis is a collective problem, but the different approaches of each jurisdiction can contribute to a collective solution.

## **FISCAL IMPACT:**

Work associated with this item is included in the Fiscal Year 2017-2018 Overall Work Program (080.SCG00153.04: Regional Assessment).

# **ATTACHMENT/S:**

**PowerPoint Presentation** 

<sup>&</sup>lt;sup>9</sup> "California Rent Stabilization Ordinances," Mobile Home Park Home Owners Allegiance, https://mhphoa.com/ca/rso/

# Mobile Home Parks as a Source of Affordable Housing

March 1, 2018

Ma'Ayn Johnson, AICP Housing & Land Use Planner





# **Costs of Owning a Mobile Home**



- New manufactured home price: \$90,000 to \$100,000
- Space rents vary:
  - Corona (Riverside County): \$470 to \$1,300
  - Median traditional unit rent: \$1,417
  - Santa Clarita (Los Angeles County) \$500 to \$1,500
  - Median traditional unit rent: \$1,653

# **Mobile Homes in the SCAG Region**

County	Parks		Lots/Spaces	S
	2008	2018	2006	2018
Imperial	79	73	3,077	2,962
Los Angeles	644	595	48,683	47,937
Orange	219	214	28,799	28,739
Riverside	350	343	34,494	34,551
San Bernardino	381	375	32,053	32,372
Ventura	102	101	10,489	10,468
Total	1,775	1,701	157,595	157,029

# **Drawbacks to Mobile Home Ownership**

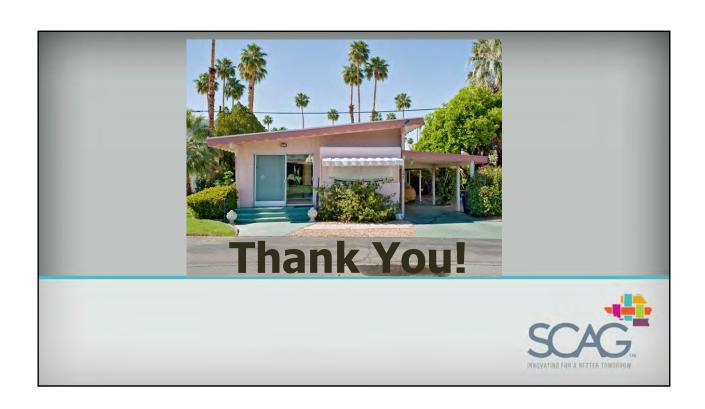
- Lack of regulation on space rent increases
- Risk of mobile home park conversion



# What Can a Jurisdiction Do?

- Adopt a rent stabilization ordinance for mobile home parks
- Encourage a "co-op" model
  - Unit owners own a share of the mobile home park
  - Financing available from HCD







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

Agenda Item No. 8 March 1, 2018

**To:** Community, Economic and Human Development (CEHD)

EXECUTIVE DIRECTOR'S

APPROVAL

Hosas Wehath

Committee

From: Ma'Ayn Johnson, Housing & Land Use Planner,

213-236-1975, johnson@scag.ca.gov

Subject: Historic Preservation, Social Equity, and Community

Engagement

#### **RECOMMENDED ACTION:**

For Information Only - No Action Required

#### **EXECUTIVE SUMMARY:**

Historic preservation has become increasingly important for many communities. . Social equity and community engagement are important aspects of historic preservation, and there are a number of resources and tools available for jurisdictions that want to preserve their historic resources. Katie Rispoli Keaotamai, Executive Director of the organization We Are the Next, will present on how historic preservation can be used as a tool for community engagement and social equity.

#### STRATEGIC PLAN:

This item supports SCAG's Strategic Plan; Goal 2: Advance Southern California's policy interests and planning priorities through regional, statewide, and national engagement and advocacy; Objective A: Cultivate dynamic knowledge of the major challenges and opportunities relevant to sustainability and quality of life in the region.

#### **BACKGROUND:**

In the face of increasing development pressures, historic preservation has become increasingly important. Social equity and community engagement are important aspects of historic preservation, and there are number of resources and tools available for jurisdictions that want to preserve their historic resources.

Katie Rispoli Keaotamai, Executive Director of We Are the Next, will present to the CEHD Committee on how historic preservation can be used as a tool for community engagement and social equity. We Are the Next is a Long Beach-based organization that has developed a number of programs to engage residents with their communities. These programs include youth programming, interactive installations, and specialized outreach. Ms. Keaotamai will highlight the work of We Are the Next and how local jurisdictions can integrate historic preservation with their social equity and community engagement efforts.



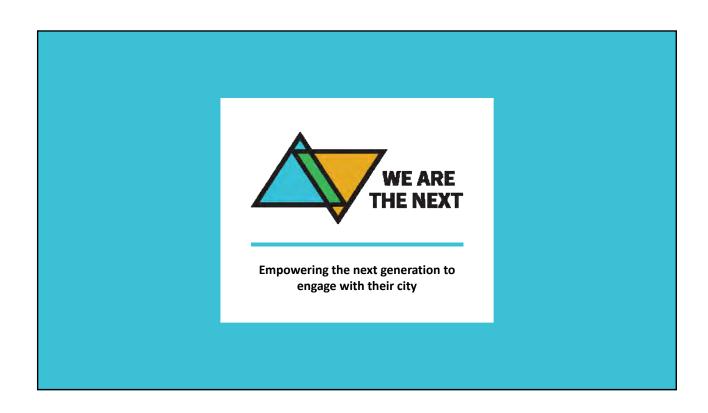


# **FISCAL IMPACT:**

Work associated with this item is included in the Fiscal Year 2017-2018 Overall Work Program (080.SCG00153.04: Regional Assessment).

# **ATTACHMENT/S:**

**PowerPoint Presentation** 







# What is We Are the Next?



We're an organization encouraging young people to build a relationship with their city.

# **Our work**

- Centers around teens and young adults
- Takes place in the greater LA region



# **Our work**

- Centers around teens and young adults
- Takes place in the greater LA region
- We provide:
  - Youth programs



# **Our work**

- Centers around teens and young adults
- Takes place in the greater LA region
- We provide:
  - Youth programs
  - Community engagement



# **Our work**

- Centers around teens and young adults
- Takes place in the greater LA region
- We provide:
  - Youth programs
  - Community engagement
  - Placemaking projects





What do you think of when you hear "historic preservation?"

# **Types of preservation**

## Restoration

 Returning a place to its historic period



Avila Adobe, Los Angeles

# **Types of preservation**

# Restoration

 Returning a place to its historic period



Avila Adobe, Los Angeles

# Rehabilitation

 Renovating a place to meet current standards



Art Theatre, Long Beach

# **Types of preservation**

# Restoration

 Returning a place to its historic period



Avila Adobe, Los Angeles

## Rehabilitation

 Renovating a place to meet current standards



Art Theatre, Long Beach

# **Adaptive Reuse**

Changing the zoning or use of a place



Anaheim Packing House, Anaheim



# Approaches to preservation

# Regulation

Cities and community organizations hire consulting firms to assess their building stock and identify buildings that could have historic significance.

# Things like:

- Surveys
- Assessments
- Historic structure reports



Residence in Belmont Heights, Long Beach

# **Incentives**

Preservation incentives allow property owners to receive tax breaks in exchange for making necessary enhancements and improvements to their property.

# Things like:

- The Mills Act
- · Preservation easements



Villa Riviera, Long Beach

# **Education**

Residents organize to protect meaningful places they feel represent the history or character of their neighborhoods.

# Things like:

- Preservation advocacy organizations
- Historical societies (sometimes)



First Taco Bell, Irvine (formerly Downey)



So what's the point?



So what's the point?

**Red tape** 



So what's the point?

Red tape
Save pretty buildings



So what's the point?

Red tape
Save pretty buildings
Recognize our history



What happens when you recognize history?



People invest in the government that invests in them.

# What's wrong here? Inequity • A bias towards architecture means not all histories have the same opportunity.

# What's wrong here? Inequity • A bias towards architecture means not all histories have the same opportunity. • Sites affiliated with marginalized communities are often ignored due to the 50 year rule.

#### Makadadadada

# What's wrong here?

# Inequity

- A bias towards architecture means not all histories have the same opportunity.
- Sites affiliated with marginalized communities are often ignored due to the 50 year rule.
- Property owner consent can be a challenge when history was made by renters.

# What's wrong here?

# Inequity

- A bias towards architecture means not all histories have the same opportunity.
- Sites affiliated with marginalized communities are often ignored due to the 50 year rule.
- Property owner consent can be a challenge when history was made by renters.
- Costs to participate in preservation programs can deter low-income communities.

# What's wrong here?

# Inequity

- A bias towards architecture means not all histories have the same opportunity.
- Sites affiliated with marginalized communities are often ignored due to the 50 year rule.
- Property owner consent can be a challenge when history was made by renters.
- Costs to participate in preservation programs can deter low-income communities.
- Properties affiliated with marginalized groups benefit less from incentives like the Mills Act.

# How can this be addressed?

- Be proactive! Engage residents of all ages in your community:
  - Don't only show up when something's wrong.
  - Identify sites to recognize
  - Ask for suggestions to reduce barriers



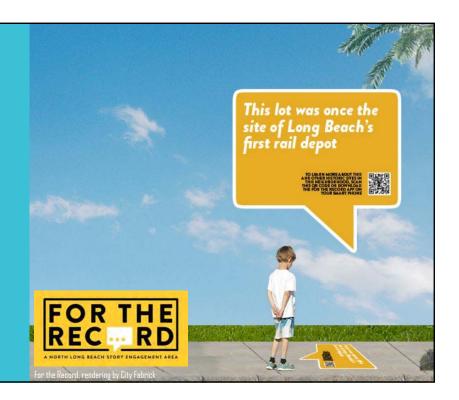
# How can this be addressed?

- Communities with no historic preservation program can adopt one... with some changes.
- When updating existing historic preservation or adaptive reuse ordinances, get creative



# How can this be addressed?

 Offer incentives or partner with local organizations to complete interpretive programs and projects







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

Agenda Item No. 9 March 1, 2018

**To:** Community, Economic, and Human Development (CEHD)

Committee

EXECUTIVE DIRECTOR'S APPROVAL

Horas Wehath

From: Kimberly Clark, Regional Planner Specialist; 213-236-1844,

clark@scag.ca.gov

Subject: Update on the Bottom-Up Local Input and Envisioning

Process for the Development of the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Regional Housing Needs Assessment (RHNA)

#### **RECOMMENDED ACTION:**

For Information Only - No Action Required

## **EXECUTIVE SUMMARY:**

In preparation for adoption of SCAG's next RTP/SCS in spring 2020, SCAG has been engaging with local jurisdictions, subregions, and other stakeholders to inform development of the upcoming RTP/SCS. This collaborative process will entail four phases, and will be concurrent with the development of SCAG's Regional Housing Needs Assessment (RHNA): (1) Regular Technical Consultation, (2) One-on-One Outreach and Local Input on Planned Growth (3) Regional Collaboration on Sustainable Communities Scenario Development, and (4) Engagement with the General Public on Potential Options for the SCS. Phase 2's kickoff was held October 31, 2017 and a letter outlining this effort was sent to city managers and planning directors for the 197 jurisdictions in the SCAG region. Moving forward, SCAG will be coordinating with subregions through June 2018 to convene local jurisdictions for one-on-one meetings to review the base datasets that will inform both the RTP/SCS and RHNA with SCAG staff. The deadline for jurisdictions to provide input on this information will be October 1, 2018.

#### STRATEGIC PLAN:

This item supports SCAG's Strategic Plan, Goal 1: Produce innovative solutions that improve the quality of live for Southern Californians, and Objective (C): Ensure quality, effectiveness, and implementation of plans through collaboration, pilot testing, and objective data-driven analysis; Goal 2: Advance Southern California's policy interests and planning priorities through regional, statewide, and national engagement and advocacy, and Objective (D): Promote and engage partners in a cooperative regional approach to problem-solving; Goal 3: Be the foremost data information hub for the region, and Objective (A): Develop and maintain models, tools, and data sets that support innovative plan development, policy analysis and project implementation; Goal 4: Provide innovative



information and value-added services to enhance member agencies' planning and operations and promote regional collaboration, and Objective (B): Promote information-sharing and local cost savings with enhanced services to member agencies through networking events, educational and training opportunities, technical assistance, and funding opportunities.

#### **BACKGROUND:**

Southern California will be facing new challenges in the development of the 2020 RTP/SCS - principally transformational technologies in the transportation and employment sectors, new greenhouse gas (GHG) reduction targets from the California Air Resources Board (CARB), new Federal Highway Administration planning requirements, MAP 21 performance metrics/goals, and a concurrent Regional Housing Needs Assessment (RHNA) cycle. Given these factors, it will be important to establish a solid baseline of existing policies and plans to understand how Southern California can accommodate future growth and thrive in the coming decades.

Starting this fall, SCAG has been engaging with local jurisdictions, subregions, and other stakeholders to inform development of the upcoming Plan. This collaborative process, called the Bottom-Up Local Input and Envisioning Process, helps SCAG to solicit input from local jurisdictions on base land use, population, household and employment growth, resource areas, sustainability practices, and local transit-supportive plans and policies to help decision makers understand how the region will perform under current circumstances to reach the forthcoming new GHG reduction targets from CARB.

This information will then be used to develop potential scenarios for the 2020 RTP/SCS, through a structured and collaborative engagement with local jurisdictions, CTCs, a broad range of stakeholder groups, and the general public. The 2020 RHNA will also be completed concurrently and in coordination with the Bottom-Up Local Input and Envisioning Process. The projection period for the 6th cycle of the RHNA will likely be from year 2022 to 2029, and will be determined by the State Department of Housing and Community Development (HCD).

To kick off the process, SCAG hosted a Toolbox Tuesday training session on October 31, 2017 that reviewed the basics of the Bottom-Up Local Input and Envisioning Process and provided an overview of the software that allows jurisdictions to make edits directly to SCAG's most important datasets - the Scenario Planning Model Data Management Site (SPM-DM). This session was accessible via webinar and from SCAG's regional video conferencing sites, and has been posted to SCAG's 2020 RTP/SCS website (<a href="http://sustain.scag.ca.gov/Pages/Online-Training-Materials.aspx">http://sustain.scag.ca.gov/Pages/Online-Training-Materials.aspx</a>). Also during the months of October and November, SCAG conducted classroom-style trainings on the SPM-DM for staff from local jurisdictions. In total, 16 trainings were held at 7 different locations throughout the region — with 190 local staff attendees and 90 jurisdictions represented. In December, SCAG sent individual letters and work plans to each jurisdictions' city manager (or county administrative officer, as applicable) and community development/planning director, which detailed how to provide input back to SCAG via the SPM-DM or other means - depending on the preference of each local jurisdiction.



Moving forward, SCAG staff have been requesting one-on-one meetings with each jurisdiction's community development director or planning director to review local data and answer questions on this process in person, starting in November 2017 and continuing through June 2018. To date, SCAG staff have met with 57 jurisdictions (29% of 197 jurisdictions in total), and have several additional meetings scheduled for the months of March and April.

Meetings for jurisdictions in Orange County will be conducted during the month of March 2018 and will be initiated by the Center for Demographic Research (CDR), the organization developing the Orange County Projections (OCP). Similarly, meetings for jurisdictions in San Bernardino County will be held during the spring of 2018 and will be initiated by San Bernardino County Transportation Authority (SBCTA) - the organization serving as lead to develop the forecast of growth in San Bernardino County. The Western Riverside Council of Governments (WRCOG) will also be providing assistance to jurisdictions in their subregion to help facilitate the development of local feedback on SCAG's data package.

#### **FISCAL IMPACT:**

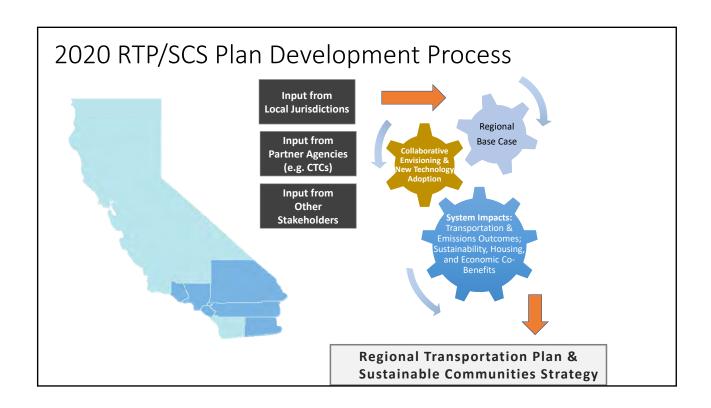
Work associated with this item is included in the current FY 2017-2018 Overall Work Program (150-4069.04: Outreach and Technical Collaboration).

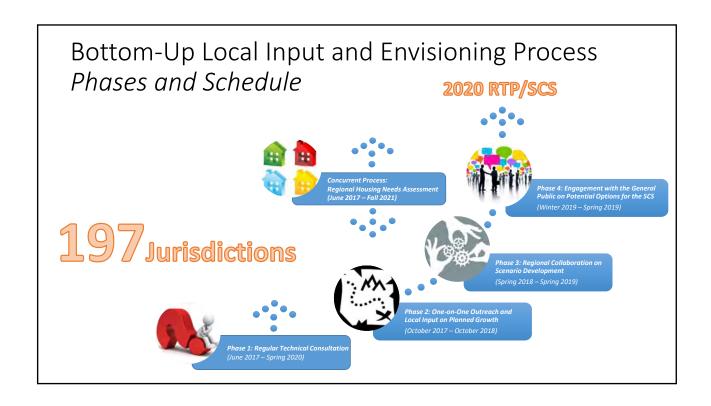
# **ATTACHMENT/S:**

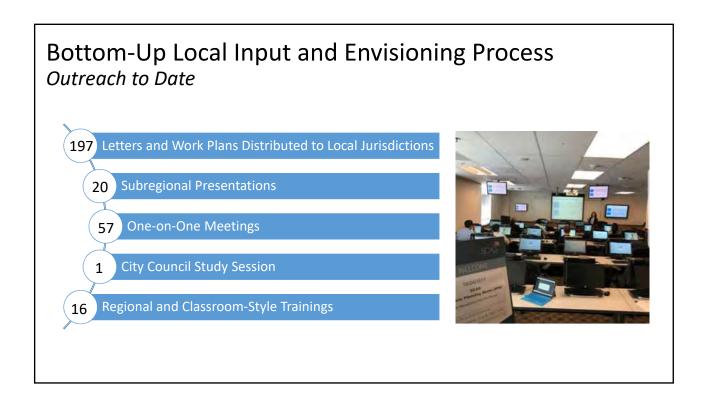
PowerPoint Presentation: "Bottom-Up Local Input and Envisioning Process for the 2020 RTP/SCS"

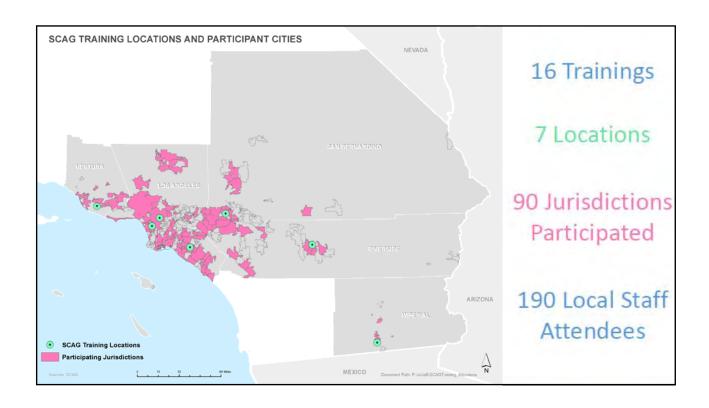
# Update on SCAG's Bottom-Up Local Input and Envisioning Process for the 2020 RTP/SCS











# Questions? - Thank You!

