



---

# CITY OF TORRANCE

---

COMMUNITY DEVELOPMENT DEPARTMENT

**DANNY E. SANTANA**  
COMMUNITY DEVELOPMENT  
DIRECTOR

18 February 2020

Bill Jahn, President  
Kome Ajise, Executive Director  
Southern California Association of Governments  
900 Wilshire Blvd, Suite 1700  
Los Angeles, CA 90017

**SUBJECT: REQUEST TO AMEND THE REGIONAL HOUSING NEEDS ASSESSMENT (RHNA)  
METHODOLOGY FOR THE 6<sup>TH</sup> CYCLE**

On February 4, 2020, the City Council of the City of Torrance adopted the attached resolution objecting to the modified methodology adopted for allocation of dwelling units under the 6<sup>th</sup> Cycle Regional Housing Needs Assessment process.

The modified RHNA allocation methodology, as well as the manner in which it was approved by the SCAG Regional Council, undermine the integrity of what is mandated to be a collaborative RHNA process, negating months of local participation, conducted in good faith. It poses a significant threat of lasting damage to the City of Torrance if permitted to stand.

The City Council therefore publicly states its opposition to the modified RHNA allocation methodology approved by the SCAG Regional Council and requests intervention on the part of HCD to direct SCAG to reconsider its action given the related lack of specificity, lack of supporting documentation, lack of vetting by SCAG staff, and near total absence of stakeholder engagement. The modified RHNA allocation methodology approved by the SCAG Regional Council effectively sets up many jurisdictions, including the City of Torrance, to fail to achieve compliance with State housing laws.

The City Council of the City of Torrance recommends that the 6<sup>th</sup> Cycle RHNA allocation be based on the Hybrid Methodology analyzed and advocated by SCAG staff as it was the result of a public vetting process, allowed for local input and facilitated greater local control of planning decisions.

The City of Torrance looks forward to working with SCAG and HCD to ensure a fair, attainable and reasonable RHNA allocation.

Sincerely,

Danny E. Santana  
Community Development Director

Attachment: Resolution Dated February 4, 2020

## RESOLUTION NO. 2020-07

### A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF TORRANCE, CALIFORNIA, OPPOSING THE MODIFIED REGIONAL HOUSING NEEDS ASSESSMENT ALLOCATION METHODOLOGY APPROVED BY THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG) REGIONAL COUNCIL

**WHEREAS**, California State housing law requires that each city and county plan for existing and future housing needs in accordance with the outcome of the Regional Housing Needs Assessment (RHNA) process; and

**WHEREAS**, the Southern California Association of Governments (SCAG) is responsible for developing a uniform methodology for the distribution of the RHNA allocation among member cities and counties; and

**WHEREAS**, a transparent and collaborative approach to regional planning, involving opportunity for informed stakeholder input and thoughtful deliberation, is critical to achieving desirable and equitable outcomes; and

**WHEREAS**, SCAG staff has recognized the importance of using the (Draft) Connect SoCal regional plan, SCAG's Regional Transportation Plan/Sustainable Communities Strategy, as informing the RHNA methodology to ensure that Connect SoCal and RHNA can proceed in parallel; and

**WHEREAS**, SCAG staff also recognized that no single jurisdiction should be over-burdened with the region's existing needs (RHNA Subcommittee Meeting staff report - October 7, 2019); and

**WHEREAS**, SCAG staff examined a number of different methodologies to allocate the RHNA numbers; and

**WHEREAS**, the SCAG process to develop the allocation methodology for the 6th cycle RHNA, covering the planning period from October 2021 through October 2029, included opportunities for stakeholder engagement throughout, including detailed discussion of three draft allocation methodology options during a series of public meetings and hearings intended to ensure robust participation by the public and affected agencies; and

**WHEREAS**, SCAG staff recommended a methodology (Option 4) in the RHNA Subcommittee Staff Report for October 7, 2019, that allocated 50 percent (50%) of the projected and existing need based upon the household growth rate between 2020 and 2030 for projected household need, and between 2030 and 2045 for existing household need; and

**WHEREAS**, on October 7, 2019, the SCAG RHNA subcommittee specifically rejected what has been referred to as the "Coastal Cities" methodology that greatly reduced the housing allocations to Riverside and San Bernardino counties and recommended the staff recommendation to the Community, Economic and Human Development (UCEHD) Committee; and

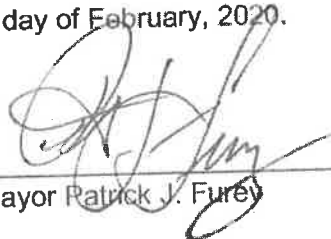
**WHEREAS**, SCAG staff recommended the hybrid methodology (Option 4) to the CEHD Committee in the Staff Report for October 21, 2019; and

**SECTION 2.** The City Council is a strong advocate of local control as the best means to protect the City of Torrance, its residents and business owners, and promote the goals and priorities of the community. The modified RHNA allocation methodology, as well as the manner in which it was approved by the SCAG Regional Council, undermine the integrity of what is mandated to be a collaborative RHNA process, negating months of local participation conducted in good faith and posing a significant threat of lasting damage to the City of Torrance if permitted to stand. The City Council therefore publicly states its opposition to the modified RHNA allocation methodology approved by the SCAG Regional Council and requests intervention on the part of HCD to direct SCAG to reconsider its action given the related lack of specificity, lack of supporting documentation, lack of vetting by SCAG staff, and near total absence of stakeholder engagement.

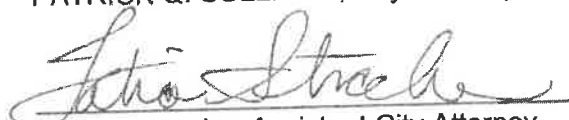
**SECTION 3.** The City Manager is hereby directed to provide notification to HCD of the City Council's action, provided in Section 2 above, concerning the modified RHNA allocation methodology and related SCAG Regional Council approval process.

**SECTION 4.** This resolution shall take effect immediately upon its adoption by the City Council, and the City Clerk shall certify the vote adopting the resolution.

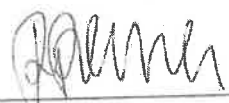
**INTRODUCED, APPROVED, and ADOPTED** this 4th day of February, 2020.

  
\_\_\_\_\_  
Mayor Patrick J. Furey

APPROVED AS TO FORM:  
PATRICK Q. SULLIVAN, City Attorney

  
\_\_\_\_\_  
Tatia Y. Strader, Assistant City Attorney

ATTEST:

  
\_\_\_\_\_  
Rebecca Poirier, MMC, City Clerk