

March 3, 2020

Kome Ajise, Executive Director
Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

RE: Request to the Southern California Association of Governments (SCAG) to Amend the 6th Cycle Regional Housing Needs Assessment (RHNA) Methodology

Dear Mr. Ajise:

The City of Rancho Palos Verdes requests that SCAG amend the RHNA methodology to reinstate local input as a factor in determining the existing housing need for the region. The City submitted comment letters on several occasions last year urging SCAG to incorporate local input into the RHNA Methodology. More specifically, the City requested that unique challenges and physical constraints that may face a city, such as being designated a Very High Fire Severity Zone, geologic hazards and wildlife/habitat preservation, as are present in the City of Rancho Palos Verdes be considered.

On February 24, 2020, the SCAG RHNA Subcommittee approved a proposed RHNA Methodology, which does not include local input as a determining factor, but also directed SCAG staff to analyze an alternative RHNA methodology introduced by the City of Cerritos. The City of Rancho Palos Verdes, like many local jurisdictions, supports the City of Cerritos' RHNA methodology at a minimum, because it recommends that household growth forecasts be reintroduced back into the calculations for the existing housing need as follows: household growth (33.3%), job accessibility (33.3%), and population within high quality transit areas (33.3%). These household growth projections are an important factor in that it takes into consideration the unique characteristics of each jurisdiction. Moreover, these growth projections more closely aligns the RHNA with the development pattern established within Connect SoCal plan as required by state statute. Finally, as stated in the staff-recommended RHNA methodology staff report for the November 7, 2019, Regional Council meeting, the reintroduction of household growth into the existing housing need would further the five objectives of state housing law.

Furthermore, the City of Rancho Palos Verdes also requests that SCAG object again to the Department of Housing and Community Development (HCD) in that they did not follow state law with the regional determination [see Government Code Section 65584.01(a)]. Even the Department of Finance recently updated its population projections and show a significant decrease since their previous forecast. Governor Newsom has also stated that his commitment to building 3.5 million homes by 2025 was a "stretch goal" and that the state would soon be releasing a more pragmatic estimate of the housing needs by region. The regional determination of 1.34 million housing units combined with an inequitable RHNA methodology are setting up local jurisdictions for failure to comply with state housing law.

While the City of Cerritos' RHNA methodology reduces the City of Rancho Palos Verdes' 6th Cycle RHNA allocation from 637 to 444, the City continues to urge SCAG to work collaboratively with member cities in finalizing a RHNA that incorporates local input, further reduces RHNA allocations to achievable levels and is based more so on facts than on a "stretch goal". We request that the RHNA Subcommittee, CEHD Policy Committee, and Regional Council consider these recommendations prior to the adoption of the RHNA. We recognize that there are time constraints established by state law; however, the RHNA will have significant impacts on jurisdictions over the next decade. Therefore, it is imperative that the RHNA be finalized in a way that is equitable and attainable in responding to the housing crisis.

If you have any questions, please feel free to contact me at (310) 544-5227 or via email at TRodrigue@rpvca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Rodrigue", written over a faint circular stamp.

Terry Rodrigue
Interim Director of Community Development