



CITY OF TORRANCE

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

RE: Request to the Southern California Association of Governments to Amend the Regional Housing Needs Assessment Methodology for the 6th Cycle.

Dear Mr. Ajise:

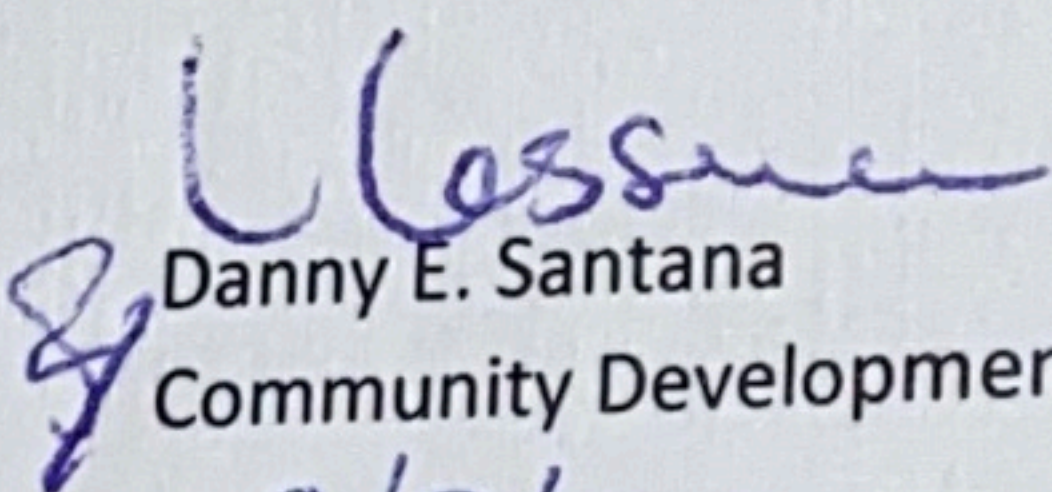
The City of Torrance requests that SCAG amend the RHNA methodology to reinstate local input as a factor in the existing need calculation. The City of Cerritos recently submitted a proposal dated February 4, 2020, which recommends that household growth forecasts be reintroduced back into the calculations for existing need. These household growth projections are an important factor in that it takes into consideration the unique characteristics of each jurisdiction. Moreover, these growth projections area more closely aligns the RHNA with the development pattern established within the Connect So Cal Plan as required by state law. 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 need would further the five objectives of state housing law.

We are also requesting that SCAF object again to the Department of Housing and Community Development (HCD) in that they did not follow state law with regard to the regional determination. 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.

We request that the SCAG RHNA Subcommittee; Community, Economic and Human Development Committee; and Regional Council consider these two recommendations prior to the adoption of the RHNA.

The City of Torrance recognizes the need for the accommodation of housing in areas that are physically suitable for housing development. While we would prefer the Hybrid Methodology advocated by SCAG staff earlier in the process, we would be willing to compromise and accept the Cerritos methodology as it reintroduces local input. Torrance looks forward to the ability to prepare a Housing Element that complies with state law and provides for the accommodation of housing within our community.

Sincerely,


Danny E. Santana

Community Development Director

3/3/2020