



Hawthorne, California

Department of Planning and Community Development

September 4, 2019

Honorable Dan Medina
South Bay Cities Council of Governments
20285 Western Avenue, Suite 100
Torrance, CA 90501

Subject: SCAG Regional Housing Needs Assessment Methodology Options

Dear Councilmember Medina,

This letter is written to provide preliminary comment on the SCAG Regional Housing Needs Assessment (RHNA) methodology options for calculating the number of housing units each city must plan for during the upcoming 2021-2029 RHNA planning cycle. The Hawthorne City Council will be discussing this matter at their next meeting scheduled for September 10, 2019 and will provide further policy direction to be included in a letter to be sent to SCAG by September 13, 2019.

We are concerned that the California Department of Housing and Community Development (HCD) has significantly overstated the housing units that should be included within the SCAG region. As a result, the SCAG RHNA methodology options result in excessive allocations to local jurisdictions to plan for new housing units. The SCAG's formulas result in the City of Hawthorne having a RHNA allocation of housing units as follows:

Option 1:	5,509
Option 2:	7,251
Option 3:	1,422

During the 5th RHNA cycle, the City of Hawthorne's total allocation was 683. The City's Housing Element for the period of 2013-2021 was updated to include a housing plan establishing goals, policies, programs and objectives to address the identified housing needs and to provide a variety of types and adequate supply to meet the existing and future needs of the community. The City has been successful in achieving housing production that achieves most of our stated goals. However, with the dissolution of redevelopment agencies and limited funding for affordable housing subsidies, our efforts will be significantly constrained to meet future RHNA targets.

All three proposed methodologies currently under review, are unacceptable because they are based on the share of regional population and would require drastic changes to our land use plan to accommodate more housing sites or greater density. Even option 3 way exceeds what we believe is reasonably attainable for a built out jurisdiction such as Hawthorne.

Furthermore, merely considering income level and existing number of rental units as indications for larger housing needs without any regards for the available land use and economic sustainability factors would be extremely short sighted and deficient methodology. It penalizes the impacted jurisdiction by causing median income plummets further and further with each RHNA planning cycle, therefore exacerbating housing needs exponentially. In reality, this is exactly what we experienced in Hawthorne taking the burden of ever increasing imposed RHNA number while some of our neighboring jurisdictions are not even being affected due to their median income level.

We appreciate the opportunity provided by the SBCCOG to further the common interests that we share in developing a RHNA allocation methodology that is reasonable and equitable among all jurisdictions.

Sincerely,

A handwritten signature in cursive script, reading "Arnold Shadbeh", enclosed within a hand-drawn oval.

Arnold Shadbeh
City Manager

CC: Mayor and City Council
Interim Community Development Director