



CITY OF
T O R R A N C E

PATRICK J. FUREY
MAYOR

CITY COUNCIL MEMBERS
GEORGE K. CHEN
TIM GOODRICH
MIKE GRIFFITHS
MILTON S. HERRING, I
AURELIO MATTUCCI
GEOFF RIZZO

September 10, 2019

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

Re: Regional Housing Needs Assessment (RHNA) Methodology and Regional House Needs Determination

The City of Torrance appreciates the opportunity to provide comments on the Regional Housing Needs Assessment (RHNA) draft methodology options for the Southern California Association of Governments (SCAG) region.

Before deciding on the RHNA methodology, the City of Torrance urges SCAG to appeal the Regional Housing Needs Determination issued by California Department of Housing and Community Development (HCD) for the 6th Cycle RHNA. With a relatively low level of housing development activity during the current housing cycle, which has occurred during a time of improved economic conditions, it is not realistic to assume HCD's regional need determination of 1,344,740 will be attainable, particularly if an economic slowdown were to occur. Utilizing the methodology options provided by SCAG, the City of Torrance may not identify enough available sites in the city to accommodate 2,392 to 9,568 housing units in the next housing cycle. This scenario likely occurs in other jurisdictions in the SCAG region. Therefore, the City of Torrance recommends that SCAG appeal HCD's Regional Housing Needs Determination and that the RHNA methodology used by HCD should be reviewed to ensure the allocation of housing units are not grossly overestimated and concentrated in the SCAG region.

Based on our review of the three RHNA draft methodology options, the City of Torrance supports Option 3 as the preferred option for the region. While none of the methodologies are perfect, Option 3 utilizes local input, is the least complex, and is the most reasonable of the three options. The City of Torrance strongly opposes Option 1 and Option 2 as each result in unattainable allocations, and Option 2 ignores local input.

The City of Torrance urges SCAG to adopt a RHNA allocation methodology for the 6th Cycle RHNA that reflects local input, is reasonable, and that allows communities to have local control over housing development. Not doing so may result in a RHNA allocation that is not achievable and one that will jeopardize the region's ability to successfully address California's housing crisis.

The City of Torrance appreciates SCAG effort and time on this complex issue and certainly understands that creating a methodology that is fair and equitable for all jurisdictions in the SCAG region is challenging. Thank you again for the opportunity to provide feedback on this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick J. Furey". The signature is fluid and cursive, with a long horizontal stroke at the end.

Patrick J. Furey
Mayor, City of Torrance