



CITY OF LA MIRADA
DEDICATED TO SERVICE

13700 La Mirada Boulevard
La Mirada, California 90638
P.O. Box 828
La Mirada, California 90637-0828
Phone: (562) 943-0131 Fax: (562) 943-1464
www.cityoflamirada.org

VIA E-MAIL

September 12, 2019

The Honorable Peggy Huang, Chair
RHNA Subcommittee
Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700
Los Angeles, California 90017

**SUBJECT: REGIONAL HOUSING NEEDS ASSESSMENT (RHNA)
ALLOCATION METHODOLOGY**

Dear Ms. Huang:

On behalf of the City of La Mirada, I am writing to comment on the proposed RHNA allocation methodologies released in consideration of the 6th Housing Cycle. The City of La Mirada appreciates the opportunity to provide formal written comments.

The City of La Mirada acknowledges the need for cities to do their part in addressing the housing crisis. In La Mirada, several housing developments have been completed in recent years, another is under construction, and even more are in the planning approval process. Four of these sites were designated/re-zoned for housing as a result of previous RHNA cycles, when the City of La Mirada received an exorbitant number of units compared to similar-sized cities in the SCAG region. However, we are concerned that the new RHNA methodology would contribute to establishing additional housing goals that may be unattainable or contribute to the detriment of existing land uses in our completely built-out community.

The City of La Mirada respectfully provides the following comments for consideration:

Impact on Economic Factors of Housing Production

It is important to understand that the production of housing is not driven by RHNA or the willingness of local municipalities to permit housing, but rather economic factors beyond the control of local government that fuel private investment in the profitable business of housing development. During the current RHNA cycle, La Mirada and most other cities in the region have experienced significant economic challenges presented by the dissolution of redevelopment in 2012, which provided significant funding to support the promotion and creation of affordable housing, and the recession, which adversely affected the production of housing. It is evident that these events together impacted our ability to facilitate the production of housing during the current RHNA cycle. Nevertheless, it is our understanding that unbuilt units will roll over into the next RHNA cycle effectively saddling us, and other cities, with additional housing units due to external economic factors beyond our control.

It is for this reason that we request that SCAG develop a methodology that takes into account the external economic factors such as interest rates, inflation, and property value, as well as recent economic anomalies that have a direct impact on the production of housing. Therefore, it is recommended that historical economic trends, together with projected economic forecasts, be reflected in the methodology in order to establish realistic and attainable housing goals. Furthermore, economic factors that have deterred the production of housing units during a particular RHNA cycle should be accounted for when determining how many units will be required to roll over into the next RHNA cycle as an adjustment to the number of housing units originally assigned to our City.

Establish a Minimum Allocation for All Jurisdictions

Since the RHNA is a regional approach to housing production, the methodology should ensure that all jurisdictions contribute at some baseline level. We recommend that a minimum allocation should be established on a sliding scale to not over-burden small jurisdictions, but to ensure that every jurisdiction makes a meaningful contribution to solving the regional housing crisis. In the 4th and 5th Housing Cycles, the methodology resulted in some jurisdictions being allocated a near-zero RHNA while other comparable cities had allocations in the thousands. The proposed methodology for the 6th Housing Cycle should include a minimum allocation for each jurisdiction, including units at every income level. Establishment of a baseline is essential for the fair distribution of RHNA.

Provide for Local Input

Local input has always been a foundational component of SCAG's RHNA planning process. It is imperative that the methodology assign the number of housing units to cities based on a process that involves local input. Working with municipalities to understand the makeup of each city can provide a more accurate perspective of local housing challenges and opportunities, as each jurisdiction has very different characteristics.

Local input is essential to land-use planning, as City officials have deliberately zoned specific areas for housing to develop the unique character of their communities. A one-size-fits-all approach in deciding how to allocate the number of housing units needed in each area would force municipalities to re-zone areas of their cities not originally intended for housing and drastically alter the character of their communities.

The City of La Mirada is mostly comprised of single-family residences, does not have major transit facilities, and has an industrial zone located near the I-5 freeway that is not ideal for residential development. Most areas previously re-zoned to allow for housing remain developed with their existing uses. Requirements to zone for additional housing will impact existing neighborhoods, and the City's limited commercial and industrial areas, which are critical for providing jobs and generating revenues to support local services.

Phasing Obligations from Existing Needs Over Future Housing Element Cycles

The existing needs component of the RHNA is substantial, as shown in SCAG's estimates. This is a result of decades of under-production, especially in the multi-family housing construction and affordable housing. While it is important to address existing housing needs, as mandated by State law, rectifying this housing shortage over the eight-year Housing Element planning period, in addition to the projected needs component, is extremely ambitious, and impractical.

With the new housing bills passed by the legislature in recent years, the RHNA is no longer simply a planning goal, but also a production target. The amount of housing units that could be allocated to La Mirada, and other jurisdictions, through the proposed methodologies is simply more than can possibly be addressed over a single eight-year Housing Element cycle. The proposed 6th Housing Cycle methodology is attempting to make up for the past shortfalls of the 4th and 5th cycles. Requiring local jurisdictions to designate significant amounts of housing to make up for past shortfalls sets unattainable expectations. We urge SCAG and the Subcommittee to work closely with HCD so that the existing need component could be phased over several Housing Element cycles.

The City of La Mirada appreciates the comment period and looks forward to working together to continue to address this important issue.

Sincerely,

CITY OF LA MIRADA



Jeff Boynton
City Manager

JB:jh
