

CITY OF PALOS VERDES ESTATES



September 12, 2019

SUBMITTED ELECTRONICALLY

Honorable Peggy Huang, Chair
Regional Housing Needs Assessment Subcommittee
Southern California Association of Governments
900 Wilshire Blvd, Ste 1700
Los Angeles, CA 90017

**SUBJECT: DRAFT REGIONAL HOUSING NEEDS ASSESSMENT (RHNA)
PROPOSED METHODOLOGY**

Dear Chair Huang,

The City of Palos Verdes Estates appreciates the opportunity to provide comments on the proposed RHNA Methodology for your consideration. Since the adoption of the 2014 Housing Element, the City has actively engaged in implementing its goals and policies including the creation of dwellings working to meet designated RHNA allocations at various income levels as identified within the Housing Element, certified by the State's Housing and Community Development Department.

While the City supports the development of housing units that improve the availability of affordable and safe housing throughout the region, the City also promotes housing that reflects the City's character and recognizes development constraints and hazards. The City requests that the Southern California Association of Governments (SCAG) consider the following challenges facing the City as it considers proposed methodology options for the upcoming Sixth RHNA Cycle:

1. Very High Fire Severity Zone. Palos Verdes Estates is within the Very High Fire Severity Zone as classified by the California Department of Forestry and Fire Protection. Senate Bill 35 recognizes the hazards associated with such classifications by exempting mandatory density provisions for Very High Fire Severity Zone communities. The City requests that this designation weigh heavily on the methodology option selection.

2. Geologic Hazards. In 2015, the City was forced to demolish several homes on Bluff Cove, where a 1983 landslide destroyed several others, due to an ongoing landslide. Additionally, a series of landslides at Christmas Cove have forced Paseo Del Mar to downsize from a two-way street to just one lane. The edge of the cliff is now only ten feet from the new one-way street, surrounded by several homes. Any additional housing units in these areas could be a matter of fatal proportions.

3. Parklands & Coastal Zone. Twenty-eight percent of the city consists of City Parklands protected by deed restrictions in perpetuity. These areas are protected from development as a land conservation effort with both stormwater and health benefits. Additionally, much of City Parklands exists within the Coastal Zone, an area protected by both the Coastal Commission and the City to maintain the coastal bluffs and marine environment as delicate natural resources.

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4. Topography. The City is home to several canyons, part of which are protected by deed-restricted City Parklands to remain open space in perpetuity; however numerous single-family property lines extend into these canyons. While a zoning map might imply opportunity for additional housing in these areas, once topography is added to the map, it becomes evident why this undeveloped land can not safely be replaced with additional housing units. The money required to construct sound structures upon such steep slopes would not yield affordable housing units.

5. State Objectives. The City would like to highlight the need for housing with access to high-quality transit in order to meet the State's objectives to reduce greenhouse gas emissions and vehicle miles traveled (VMT). High-quality transit does not exist inside nor within a half-mile of the boundaries of Palos Verdes Estates, so any new high-density housing required by the State to be built within the city will require residents to rely primarily upon private vehicles for transportation. Based on Options 1 and 2 proposed by SCAG's RHNA Methodologies Estimate Tool, the State-mandated housing units will result in a significant increase in greenhouse gas emissions and VMT, which is fundamentally counterproductive to the State's objectives.

The City of Palos Verdes Estates hereby recommends, at this stage in the process, selection of RHNA Methodology Option 3 as the option most aligned with the objectives of the State, the health and safety of residents, and the protection of natural resources. Thank you for considering the unique challenges and physical constraints facing Palos Verdes Estates. We look forward to continued dialogue on this matter. Please contact me with any questions or concerns at (310) 750-9801 or cpetru@pvestates.org.

Sincerely,

Carolynn Petru, City Manager
City of Palos Verdes Estates

CC: Kenneth J. Kao, Mayor
Palos Verdes Estates City Council
Ken Rukavina, Director of Community Development & Public Works
Brianna Rindge, Planning Manager