



September 13, 2019

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

Re: Regional Housing Needs Assessment (RHNA) Comment Letter

Dear Ms. Huang,

The City of Avalon thanks the Southern California Association of Governments (SCAG), and especially the RHNA Subcommittee, for their work in developing and shaping three methodological considerations for the region and all its member jurisdictions. While the City appreciates the efforts to address the housing supply and affordability crisis (and is deeply committed to working to address this), Avalon shares in its concerns with the Draft RHNA Methodology (Methodology) and its impact on local jurisdictions.

Unless adjusted, the proposed methodologies do not take into consideration the socioeconomic and cultural factors that characterize our community, resulting in a significant disproportionate and excessive number of affordable housing units being assigned to Avalon and the rest of the Gateway Cities COG region at the expense of disadvantaged, densely populated and built-out communities. Further, the three draft methodologies do not consider the City's unique geographical location of being the only municipality on an island in the state of California, the lack of developable land (the majority of which is privately held), the existing high density buildout of the community, the freeze on additional water allocations needed for any and all future development, the inability to expand city boundaries, and other significant environmental concerns. Santa Catalina Island is approximately 74.98 square miles of which 99% is privately held (88% is protected under a conservancy and another 11% is controlled by a privately held corporation); however, the City of Avalon only accounts for 1% of the total ownership and approximately 2.88 square miles of land.

The City, in support of the Gateway Cities Council of Governments (GCCOG) analysis and the ability to accommodate housing with the proposed methodology options, recommends the following key provisions and considerations:

- This cycle of RHNA should include a credit to those jurisdictions that have facilitated housing creation and increased density in previous cycles. Current RHNA allocations should be dismissed due to economic anomalies (Dissolution and the Great Recession).



- The Draft Methodology should be adjusted to account for existing open space areas and open space deficiencies, high levels of existing density, and existing single-family residential as constraints to further growth.
- The Draft Methodology should explicitly assure that all jurisdictions within the SCAG region share in the responsibility for housing production.
- This cycle of RHNA should take into account economic factors that have adversely affected the ability of local municipalities to produce affordable housing units during the current RHNA cycle including the dissolution of Redevelopment by the State of California (that effectively eliminated significant one-time funding for the production and creation of housing) and the Great Recession. These external economic factors should be taken into consideration at the end of this RHNA cycle to “true up” and/or correct the housing obligations of local municipalities that are proposed to “roll over” into the next RHNA cycle, if at all.
- The Draft RHNA Methodology should incorporate historical economic trends and forecasted economic projections that have a direct impact on the production of housing and that are beyond the control of local municipal government.
- Local municipalities must be provided the means to financially support the production of housing units, which on average results in an increase in the local population at a ratio of 3:1, thereby placing an added demand on core city services on an ongoing and continuous basis. One-time monetary funding must continue to be provided to all communities for subsidizing the acquisition of property and construction, while on-going revenue generated by way of property tax reform must be made available to local municipalities to cover the increased cost of providing core city services for new residents in perpetuity.

The draft methodology does not account for constraints found in Avalon or the Gateway Cities COG region such as residential density, environmental contamination, industrial/warehouse uses, open space and jobs-housing imbalance. Density in Avalon, as with many Gateway Cities jurisdictions, exceeds County, Region and State averages. Further compounding the issue is the lack of available land for development (99% of Catalina Island is privately held and most is protected wildlands while less than 1% is owned by the City) and the lack of near future allocable water. Without additional future water allocations, new development of housing units will not be permitted.

A lack of open space, recreational amenities, quality infrastructure and existing environmental hazards impact the health of existing residents and represent additional constraints for new residential development. The City of Avalon has an average of 1.6 acres of open space per 1,000 residents, far below the SCAG recommendation of 4.0 acres per 1,000 residents and a fraction of national standards of open space per capita.

Cities throughout the Gateway Cities COG region face additional challenges beyond land dedicated to industrial/warehouse uses and density constraints. Avalon, as with a majority of Gateway Cities, are



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identified as disadvantaged communities by CalEnviroScreen 3.0. Environmental justice demands that we address these hazards and conditions but also informs that we cannot continue to concentrate new housing in these areas until existing infrastructure and health issues are addressed. Additionally, many of the City's workers are transient and seasonal, commuting across the Pacific Ocean to work, but returning back to the mainland to live.

It is inappropriate that the Draft Methodology includes consideration of constraints such as open-space, habitat and wildlife areas, applicable to already lower-density and/or undeveloped suburban locations, whereas the constraints facing the Gateway Cities COG outlined herein that play a more significant role in the health, safety, welfare and lives of our residents are not considered. This shortcoming is unjust and should be addressed in the final Draft Methodology.

The City of Avalon thanks SCAG staff for their efforts in navigating and refining the RHNA methodology. Should you have any questions regarding this matter, please contact Michael Parmer, Assistant City Manager, at (310) 510-0220 ext. 121 or at [mparmer@cityofavalon.com](mailto:mparmer@cityofavalon.com).

Sincerely,

Anni Marshall  
Mayor

CC: Cinde MacGugan-Cassidy, Mayor Pro Tem  
Oley Olsen, Councilmember  
Steven Hoefs, Councilmember  
Denise Radde, City Manager  
Michael Parmer, Assistant City Manager