

The City of Bellflower

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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) Methodology

Dear Chair Huang:

The City of Bellflower appreciates the opportunity to provide comments on the proposed RHNA Methodology. The City has reviewed SCAG's three housing allocation methodologies for distributing regional housing. Of the three options that were developed, the **City of Bellflower is supportive of Option 3.**

The City of Bellflower has a population density per square mile of 12,393 according to the 2010 Census, which exceeds the Los Angeles County average of 7,372. The City is also built-out with minimal land available for residential development. Population density and the built-out environment are factors that should be taken into consideration in distributing the RHNA allocation.

Option 3 considers land use and development constraints as identified through the local input process. The City staff spent a considerable amount of time in SCAG's bottom-up local input and envisioning process to accurately report local growth. The City believes that local input should be a main factor in the methodology because it determines the housing need at the local level and considers the City's development constraints, as opposed to an approach that does not differentiate these factors among cities. This method would distribute housing needs in a fair and equitable manner. In addition, it is a practical and reasonable approach in determining the housing needs for each jurisdiction.

Option 2 only emphasizes High Quality Transit Areas as a methodology factor and fails to consider local input and development constraints. While Option 1 does include local input, it is not the main factor in the methodology and would allocate an unbalanced amount of very-low and low-income units to moderate and above-moderate income units. In addition, Options 1 and 2 would result in a significant increase in housing units in the City of Bellflower. In an already dense and built-out environment, Option 1 and 2 methodologies are not practical or realistic to meet the housing needs of the City and region.

For the reasons stated above, the City of Bellflower is in support of Option 3. If you have any questions, please feel free to contact me at (562) 804-1424 ext. 2276 or ecorpuz@bellflower.org.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth Corpuz".

Elizabeth Corpuz
Director of Planning and Building Services