



CITY OF CULVER CITY

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September 12, 2019

Mr. Kome Ajise
Executive Director
Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

Subject: City of Culver City Comments Regarding the 6th Cycle Regional Housing Needs Assessment Allocation

Dear Mr. Ajise:

The City of Culver City (Culver City) is submitting comments regarding the Southern California Association of Government (SCAG) Regional Housing Need Assessment (RHNA) allocations under the 6th RHNA Cycle. Culver City recognizes that preparing the RHNA is a complex process that must take into account a wide variety of issues. The process must be designed on a truly regional basis to address the housing crises impacting all communities in the State.

SCAG proposes the following three RHNA distribution methodologies to establish each jurisdictions share of the regional need for 1.3 million housing units during the 6th Cycle RHNA:

- 1) Distribution formula combining existing need and projected need, based on existing overcrowding, existing cost-burden, and existing vacancy rates below fair market rates, and projected household growth, future vacancy need, and future replacement needs.
- 2) Distribution formula based on regional total provided by State Department of Housing and Community Development (HCD), and allocated based on jurisdictions share of regional population and proximity to high quality transit areas.
- 3) Distribution formula based on local input on household growth, vacancy needs, and jurisdictions share of regional growth and need.

Culver City believes that SCAG should develop a new formula to allocate housing need, based on each city's regional share of housing units, adjusted up or down based on the following factors:

- The relative cost of housing in the city
- The relative amount of multifamily housing provided in the city
- The relative amount of subsidized affordable housing units provided in the city
- The relative amount of available high-quality public transit serving the city
- The degree of any jobs/housing imbalance
- The relative concentration of jobs within a short commute from the city

A RHNA methodology based on these factors will more effectively distribute housing to achieve sound housing policy and provide the basis for sustainable development, social equity, smart growth, enhanced mobility, environmental responsibility, resiliency and economic opportunity. Under the current methodology, with each RHNA cycle, housing production consistently lags behind population and job growth resulting in both a statewide housing deficit and urban sprawl, which combine to severely impact all California cities. Without adequate housing supply, we cannot effectively deal with education, housing affordability and economic growth. The proposed RHNA methods for allocating housing need violate the very principles of good planning practice and State Housing Element Law that they are intended to address.

In summary, the RHNA allocations will determine how and where Southern California will grow for decades. We have the ability now to effectively distribute that growth in a manner that advances common goals to make our cities more livable, sustainable and environmentally responsible. Please consider the above factors in developing the RHNA.

Sincerely,



Meghan Sahli-Wells
Mayor

cc: The Honorable Members of the City Council
John M. Nachbar, City Manager