



September 13, 2019

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

SUBJECT: Draft Regional Housing Needs Assessment (RHNA) Proposed Methodology

Dear Chair Huang;

The City of Laguna Beach supports SCAG's recommendation to file an objection to the State Department of Housing and Community Development's (HCD) release of a Regional Housing Needs Determination of 1,344,740 units for the SCAG Region that would need to be planned during the period from June 30, 2021 to October 15, 2029.

While the City supports the preservation and development of housing and particular affordable housing, as reflected in the numerous housing policies and provisions specified in the City's General Plan Housing Element, we respectfully request that the Regional Council and HCD consider the various constraints to development of housing as a result of local conditions within a jurisdiction. For example, the City of Laguna Beach is faced with the following constraints to additional affordable housing development:

### **Environmental and Topographical Constraints**

The City of Laguna Beach is a built-out coastal community with unique environmental and topographical constraints that limits potential for both new development and intensified redevelopment of affordable housing units. Specifically, the City is predominantly influenced by steep hillside terrain and open space, which poses both topographic and geographic constraints for development. Many of the City's existing neighborhoods have streets that are narrow, steep and often dead end; thereby restricting further density intensification due to life-safety issues. The City is concerned that the proposed Draft RHNA Methodology released by SCAG, in conjunction with the August 22, 2019 HCD Regional Housing Need Determination letter may result in adverse environmental impacts to the City and its residents. Specifically, the City is concerned that the result of the obligation for this community to provide up to 1,300 new housing units in a jurisdiction that does not have the physical capacities to accommodate such an increase would be detrimental to the safety of Laguna Beach residents and its many visitors.

### **Very High Fire Hazard Area and Evacuation Constraints**

As identified in the City's Hazard Mitigation Plan, the topography of Laguna Beach is extremely conducive to wildfires because the community and most of its developed areas contain and/or are bordered by natural, undeveloped hillsides. Resultantly, most of the City is considered by the State as a Very High Fire Hazard Severity Zone (VHFHSZ). One of the biggest wildfire events in the State's history was the Laguna Canyon Fire of 1993, which began on October 27<sup>th</sup> in an unincorporated area near Laguna Canyon Road. This fire event injured 37 people, damaged or destroyed 441 structures in the City, burned approximately 14,440 acres, and caused approximately \$530 million in damage (close to \$2 billion in 2017 dollars).

In addition to being a City that is impaired by potential wildfires, Laguna Beach is also physically encumbered in its ability to evacuate residents. For example, Laguna Beach has only three access points to provide evacuation routes to the City's residents and many visitors that include Pacific Coast Highway (northbound and southbound) and Laguna Canyon Road – Highway 133. The past history of wildfires in Laguna Beach and the presence of VHFHSZs in and around the community suggest that fire events are likely in the future and a significant increase in the number of residential units in the City by up to 1,300 units may result in adverse impacts to life-safety and the availability of first responder and emergency evacuation services.

### **The Proposed RHNA Methodology Does Not Consider Local Constraints**

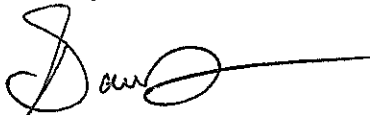
Laguna Beach staff closely coordinated with the Center for Demographic Research (CDR) in identifying the local growth forecast through the 2018 Orange County Projections. These efforts involved extensive preparation of official demographic forecasts for Orange County that included sub-regional and regional applications for the development of Orange County growth forecasts that are used in State and federally mandated programs, including transportation, housing, and air quality requirements. Based on the City's experience in the aforementioned processes, it is unclear how the proposed RHNA allocation of 1,344,740 units translates into a fair local housing unit obligation for the SCAG Region. In addition, the proposed methodology and options presented assign a share of housing based on the regional population, whereas the City of Laguna Beach is a very small percentage of the gross regional population (Los Angeles County, Orange County, Riverside County, San Bernardino County, Ventura and Imperial County). To assign an allocation based on the gross regional need of 1,344,740 units does not factor local constraints such as the availability of land, size of jurisdiction, a built-out community scenario, market constraints, or unique environmental and hazard considerations.

### **Conclusion**

To assign a regional housing need based solely on the gross regional need of 1,344,740 units is a "one size fits all approach" that fails to consider local constraints such as availability of land, size of jurisdiction, a built-out community scenario, coastal resources, market constraints, limited funding opportunities for small communities and unique environmental and hazard considerations. It is our hope that these factors will be incorporated into the RHNA methodology and determination process.

Please contact me if you have any questions at (949) 497-0362, or via email at [sdrapkin@lagunabeachcity.net](mailto:sdrapkin@lagunabeachcity.net).

Sincerely,



Scott Drapkin  
Planning Manager,  
City of Laguna Beach