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September 13, 2019

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

Re: Draft RHNA Methodology

Dear Ms. Huang,

I am writing on behalf of the City of Paramount regarding the Draft Regional Housing Needs Assessment (RHNA) that the RHNA Subcommittee has diligently been preparing since late 2018. We appreciate the opportunity to submit comments.

The City of Paramount respectfully requests an adjustment of the methodology options to consider the following:

- Recognize past RHNA cycle achievements. Paramount is a jurisdiction that took extensive efforts to promote and ultimately meet goals for the construction of housing units in previous RHNA cycles. In one of many examples, a 306-unit mixed-income apartment complex included 62 units for very low income, low income, and moderate income households was constructed in a prominent blighted area of Paramount with backing from the Paramount Housing Authority with a housing bond allocation.
- Distribute very low and low income units. Cities with a higher concentration of very low and low income households should be assigned a lower percentage of these income-category units to promote equity.
- All cities. The City of Paramount supports the development of compact, walkable housing projects that promote localism and less vehicle trips. However, these housing types should not need to be necessarily located at the densest populated cities or cities advantaged with quality mass transit connections. All cities throughout the SCAG region should receive a fair housing allocation in support of a common density goal. Paramount is one of the most densely populated cities in the nation (ranked #82) – the population density is between the densities of Chicago and Philadelphia. The RHNA methodology should allow for future housing to be more fairly distributed through the region.

- Role of manufacturing in site unavailability. Paramount has an above-average percentage of land area zoned for manufacturing. Although some communities with legacies of heavy industry are now left with acres of brownfield properties as the manufacturing base has largely shifted to other countries, Paramount and similar cities are different; Paramount is a built-out city with thriving manufacturing businesses of a range of scales and a vacancy rate that has hovered just below 1% in recent years. Due to a resurgence in industrial activity and a repurposing of manufacturing sites into wholesale/distribution uses that accompany the strong activity of the Port of Long Beach and Port of Los Angeles, rezoning industrially classified land for housing would only be a theoretical exercise and is not practical.

Thank you for your attention to the comments above. You are welcome to contact me at 562-220-2048 or jcarver@paramountcity.com if you have any questions.

CITY OF PARAMOUNT



John Carver
Planning Director