



City of Whittier

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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: Regional Housing Needs Assessment (RHNA) Methodology – City of Whittier

Dear Ms. Huang,

The City of Whittier appreciates the opportunity to submit this comment letter to the RHNA Subcommittee regarding the appropriate RHNA allocation and methodology for the Southern California Association of Governments (SCAG) region.

The purpose of this letter is to share our concerns with the draft RHNA allocation and methodology and its impact on the City of Whittier. Whittier is deeply concerned that unless adjusted, the housing unit allocation figures from the State Department of Housing and Community Development (HCD) and SCAG's unit distribution methodology will fundamentally and unilaterally change each Town, City, and County within the SCAG region by forcing unplanned densification of land use.

Whittier is one of the twenty-seven member cities and the County of Los Angeles that comprise the Gateway Cities Council of Governments (Gateway Cities COG). The Gateway Cities COG worked together to formulate the 10-page letter plus graphical and statistical attachments that was sent to you on September 5, 2019. Whittier shares the concerns raised in the letter and rather than recite them here again we would like your consideration of the following summarized concerns. **Whittier will have great difficulty accommodating the draft RHNA allocation** totaling between 4,046 to 4,916 housing units, 44% to 53% of which must be available to low- and very low-income households.

- **Whittier has already upzoned considerable swaths of the City.** In the last 15 years the City has addressed housing supply and affordability in spite of the City's largely built-out nature. The City has increased zoning intensities through adoption of three "smart growth" specific plans to allow for densification and mixed land uses in the Uptown, Whittier Boulevard, and Lincoln (Nelles) areas. Combined the City has entitled over 1,000 new dwelling units in the last five or so years and approved specific plan development capacity of at least 1,000 more units.

- **Remaining areas of the City are largely single family residential.** Currently Whittier has 22,590 parcels contained within the City Limit. A total of 18,386 parcels or 81.4% of the City-wide total are used for single family residential. Owners of these parcels purchased in the suburban setting they prefer and are, therefore, unlikely to drive land use change and densification on those parcels. The balance of 4,204 parcels are devoted to multi-family residential, commercial, industrial, open space, public, and other uses. Large portions of these remaining parcels and areas have previously been upzoned to accommodate increased housing density as detailed in the first bullet point above.
- **Overlaying a new “Master Plan” on a build out City is difficult.** Why are “Master Planned” cities so attractive to live, work, and play in? Because engineers and planners have carefully considered each land use and density to provide a balance that facilitates a highly livable and sustainable environment. Infrastructure and services are appropriately matched to land uses. While Whittier has adopted similar specific plans over previously urbanized area, doing so after the area has been developed makes it exceedingly difficult to strike the right balance and create the most livable and sustainable environment for new and existing residents and businesses.
- **Whittier has large regional open space habitat preserves and recreation areas.** The northerly reaches of the City and much of the adjacent County Unincorporated areas were set-aside as permanent open space as mitigation for the habitat destruction caused by the massive Puente Hills Landfill. Closed since 2013, the landfill, when operating, was recognized as the largest in the United States. The County is seeking long-term reuse of the land as recreation and open space, with no consideration of housing on the site.
- **The City of Whittier does not have the internal capacity to build housing.** While Whittier has upzoned and entitled many housing units in the last 5 years, in the end a housing developer must make the financial risk versus reward decision to invest their capital and develop new housing. The City should not be penalized because developers are not willing to build housing in Whittier.
- **Residents of Whittier are concerned with impact of new development.** During the recent specific plan upzoning efforts, it has become apparent that much of Whittier’s 50 to 130 year old infrastructure does not have sufficient carrying capacity to accommodate extensive growth. This applies to all City services, including but not limited to water, sewer, roadway, active recreation and open space, and emergency services. During adoption of the specific plans the City prudently completed programmatic environmental impact reports (EIR) under the California Environmental Quality Act, which identified the lack of capacity and required upgrading of infrastructure and services in order to accommodate the approved growth. The City’s budget forecast shows growing deficits for the coming years, which will limit the City’s ability to pay for fair-share infrastructure and service improvements necessary to accommodate the forecasted RHNA unit allocation.

- **Funding to build low- and very low-income housing is woefully inadequate.** Affordable housing typically requires government subsidies that range from \$50,000 to \$250,000 per housing unit. Under the draft SCAG RHNA calculations, Whittier would need to build between 1,779 and 3,096 low- and very low- income units. Even building the low end of the unit allocation would require a potential government subsidy ranging from \$88,950,000 to \$444,750,000. These staggering funding requirements are simply not available.

Development in Whittier began more than 130 years ago and the City is virtually built out with little or no vacant developable land. This fact represents a substantial constraint not acknowledged in the draft SCAG RHNA allocation and methodology. While the City has made significant efforts through its specific plans to densify existing corridors and districts, the majority of Whittier's remaining single family residential neighborhoods cannot accommodate similar densification. Furthermore, the hills north of Whittier contain regional open space, sensitive habitat and wildlife areas that must be preserved in perpetuity. These facts must also be somehow accounted for in the draft RHNA allocation and methodology.

The final RHNA allocation and methodology must be fair and equitable while reflecting the capacity for reasonable housing unit construction throughout the SCAG region. Additionally, residents should have a voice in the type of community they wish to live in as well as where they may have made the largest investment of their life – in their home.

Thank you again for the opportunity to submit comments. Should you have any questions, please do not hesitate to contact me.

Sincerely,



Conal McNamara, AICP
Director of Community Development

Copy to:

State Assemblyman Ian Calderon, 57th District
State Senator Bob Archuleta, 32nd District
Los Angeles County Supervisor Janice Hahn, 4th District
Whittier City School District, Dr. Maria Martinez-Poulin, Superintendent
Whittier Union High School District, Martin Plourde, Superintendent
East Whittier City School District, Marc Patterson, Superintendent
Whittier Chamber of Commerce, Carol Crosby, Executive Director