



SOUTH BAY CITIES
COUNCIL OF GOVERNMENTS

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October 8, 2019

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

Dear Mr. Ajise,

The South Bay Cities Council of Governments (SBCCOG) appreciates the opportunities that SCAG has provided to learn more and comment on the proposed RHNA allocation options. In the last few weeks, Ping Chang has spoken directly with our Planning Directors and also made a presentation and answered questions at a special workshop that we had for the Board of Directors on this subject.

As a result of our workshop, the Board of Directors has asked us to express these areas of concern:

- The accuracy of the data sets has been challenged. The information needs to be correct and verified. As well, the information for municipalities needs to be the same format and calculations, to ensure that the data sets are comparing like for like information. As discussed at the RHNA Subcommittee meeting yesterday, October 7, 2019, it is necessary that there be additional work with interested SBCCOG member cities and SCAG staff to validate and confirm that the data is accurate and consistent in support of the recommended methodology.
- The allocation process should consider and expand the allowance of new places that people will and/or are currently living in – ADU's / JADU's, Boat live-aboards, Senior Assisted Living, Long-Term Senior Care facilities.
- Disadvantaged communities (such as Hawthorne in the South Bay) that already have provided for lower cost housing believe that they are being overburdened. This is not equitable. They should be given special consideration.
- Job rich communities, especially those with multiple transit stations, should be considered for adjacent housing opportunities.
- Cities should be encouraged to consider worn-out strip malls for re-zoning to housing.
- Housing projects should reasonably address all income levels with higher percentages of housing for low incomes than are currently included.

We understand that your work on RHNA is not easy and we thank you for trying to work out a fair process and allocation for the region, but we ask that you take our continuing concerns into consideration and address them if possible.

With gratitude,

Christian Horvath, SBCCOG Chair
Councilman, City of Redondo Beach

cc: Sarah Jepson, SCAG Acting Planning Director

LOCAL GOVERNMENTS IN ACTION

Carson El Segundo Gardena Hawthorne Hermosa Beach Inglewood Lawndale Lomita
Manhattan Beach Palos Verdes Estates Rancho Palos Verdes Redondo Beach Rolling Hills
Rolling Hills Estates Torrance Los Angeles District #15 Los Angeles County