

**SUBMITTED ELECTRONICALLY**

October 29, 2019

Honorable Peggy Huang, Chair  
Regional Housing Needs Assessment Subcommittee  
Southern California Association of Governments  
900 Wilshire Blvd, Suite No. 1700  
Los Angeles, CA 90017

**SUBJECT: DRAFT REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) PROPOSED METHODOLOGY**

Dear Chair Huang,

On August 20, 2019, and September 9, 2019, the City of Rancho Palos Verdes submitted comment letters regarding the proposed 6<sup>th</sup> cycle RHNA methodology options being considered by the Southern California Association of Governments (SCAG). The City's comment letters urged SCAG to develop a methodology that considers unique challenges and physical constraints that may face a city, such as being designated a Very High Fire Hazard Severity Zone, geologic hazards and wildlife/habitat preservation, as are present in the City of Rancho Palos Verdes. The City also urged SCAG to develop a RHNA methodology that promoted housing with access to high-quality transit in order to meet the State's objectives to reduce greenhouse gas emissions and vehicle miles traveled.

On September 23, 2019, SCAG staff previewed a staff-recommended draft methodology, which has since been presented to SCAG's RHNA Sub-Committee and Community, Economic and Human Development (CEHD) Committee for consideration. Using the RHNA Methodologies Estimate Tool under the recommended draft RHNA methodology, the City of Rancho Palos Verdes would be required to provide 94 housing units at various income levels during the next planning period of 2021-2029.

As SCAG proceeds toward a final RHNA methodology, the City of Rancho Palos Verdes continues to urge SCAG to finalize a RHNA methodology that considers the City's unique challenges and physical constraints, as such factors severely limit the availability of land throughout the City to accommodate new housing. City Staff is concerned that "top down" housing mandates combined with the lack of available housing sites, combined with the State legislature's willingness to punish cities that do not achieve their RHNA allocations, are setting up the City for an unachievable 6<sup>th</sup> Cycle RHNA allocation.

While the City continues to express concerns regarding the proposed RHNA methodologies, the City appreciates the efforts of SCAG throughout the RHNA process and in further considering the comments provided in this letter.

If you should have any questions, or would like further assistance, please feel free to contact me at (310) 544-5227 or by email at [aram@rpvca.gov](mailto:aram@rpvca.gov) or Senior Planner, Octavio Silva at (310) 544-5234 or by email at [octavios@rpvca.gov](mailto:octavios@rpvca.gov).

Sincerely,



Ara Mhramian, ACIP  
Director of Community Development

c: *Jerry Duhovic, Mayor, Rancho Palos Verdes*  
*Rancho Palos Verdes City Council*  
*Hon. Dan Medina, RC District # 28, GCCOG*  
*Hon. James Gazeley, RC District # 39, SBCCOG*  
*Hon. Judy Mitchell, RC District #40, SBCCOG*  
*Jacki Bacharach, Executive Director of the SBCCOG*  
*Doug Wilmore, City Manager*  
*Kit Fox, Interim Deputy Director of Community Development*  
*Octavio Silva, Senior Planner*