

SUBMITTED ELECTRONICALLY

September 9, 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, the City of Rancho Palos Verdes submitted a comment letter regarding the proposed 6th cycle RHNA methodology options currently being considered by the Southern California Association of Governments (SCAG). The City's comment letter highlighted the unique challenges and physical constraints that face the City, such as being designated a Very High Fire Hazard Severity Zone, the presence of geologic hazards, and the preservation of sensitive wildlife and habitat. The comment letter urged the RHNA Subcommittee to consider such factors in selecting a RHNA methodology.

Since the issuance of the City's comment letter, the State's Housing and Community Development Department (HCD) issued a regional determination need of 1,344,740 total housing units for the SCAG region. Based on this figure and using SCAG's RHNA Methodologies Estimate Tool, the City of Rancho Palos Verdes would have a RHNA allocation of 1,852 housing units under Option 1, 2,390 housing units under Option 2, and 75 housing units under Option 3. Methodology Options 1 and 2 present a significantly higher RHNA allocation than what the City was assigned for the 5th RHNA cycle. These methodology options would pose an undue burden upon the City to accommodate for housing in the next Housing Element cycle without considering the unique physical challenges faced by the City.

The City would also like to bring attention to the need for housing with access to high-quality transit in order to meet the State's objectives to reduce greenhouse gas emissions and vehicle miles traveled. The City of Rancho Palos Verdes, along with its neighboring Palos Verdes Peninsula cities, are located in a region with very limited access to high-quality transit. In fact, the City recently learned that, due to the recent reduction in ridership, the LA Metro is considering eliminating Route 344, which serves Hawthorne Blvd., a major arterial for the Peninsula. With limited access to high-quality transit, combined with the consideration to eliminate Route 344, any new high-density housing required to be built in the City by the State will inevitably require residents to rely primarily upon private vehicles for transportation. Based on Options 1 and 2--and perhaps Option 3--the State-mandated housing units will result in a significant increase in vehicle miles traveled and greenhouse gas emissions, which is fundamentally counterproductive with the State's and Governor's objectives.

The City recommends that SCAG appeal HCD's regional determination need figure before deciding on a RHNA methodology option. The City also strongly urges SCAG to select RNHA Methodology Option 3, as

this option most appropriately utilizes local input amongst the three options, and provides the City with a RHNA allocation that the City can plan for in the upcoming Housing Element planning cycle.

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.

Sincerely,



Ara Mihranian, 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*