



CITY OF CULVER CITY

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July 17, 2019

Via Email

Mr. Ben Metcalf, Director
California Department of Housing & Community Development
2020 West El Camino Avenue
Sacramento, CA 95833
Ben.Metcalf@hcd.ca.gov

Subject: Comments on the Methodology Used for the Draft Regional Housing Needs Assessment

Dear Mr. Metcalf:

The City of Culver City (Culver City) appreciates the work that the Southern California Association of Governments (SCAG) has invested in developing the Draft Regional Housing Needs Assessment (RHNA) Consultation Package (Consultation Package). Culver City urges the California Department of Housing and Community Development (HCD) to review the Consultation Package critically and carefully as it determines the regional total housing need.

The RHNA process is governed by Government Code section 65584 *et seq.* and vests authority in HCD to accept, reject, or modify the data and assumptions in the Consultation Package, determine the methodology to use under section 65584.01(b)(2), and, ultimately, determine the region's housing needs. As a guide for its part in this consultation process, SCAG purported to apply a framework that included the following goals:

- Follow the SCAG 2020 RTP/SCS growth forecasting process, procedure, methodology, and results including bottom-up local review, comment, and input.
- Provide the best outcomes for the SCAG regional housing needs assessment and determination, meet the requirements of the law, and use the best available data and technical methodology.
- Research the appropriate factors and causes associated with "existing housing needs."
- Develop policy responses for a long-term robust, stable, supply of sites and zoning for housing construction.

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Based on the plain language of Government Code section 65584 *et seq.*, the SCAG framework, and Culver City's interest in fact-based regional planning, Culver City writes to express the following comments and concerns with the Consultation Package:

- The Government Code requires analyses of existing and projected housing need to be based on assumptions that include consideration of the overcrowded rate for a comparable housing market. The Consultation Package identifies comparable housing markets *solely* by reference to various regions' foreign-born population share. The assumptions that a single metric can determine what a "comparable housing market" is and that national origin is acceptable to stand alone as that metric are facially unsupported. HCD should accord SCAG's overcrowding assumptions little, if any, deference.
- The Government Code further requires that councils of governments consider cost burden and the rate of housing cost burden for a healthy housing market. The Consultation Package does not undertake this task, on the grounds that "cost burden is an income-based social condition rather than a specific measure of housing undersupply." Because the Consultation Package provides no response to this mandated data assumption, HCD must provide the assumption and, based on that assumption, increase the total existing and projected housing need.
- The Consultation Package suggests that local governments should not be required to plan to meet existing housing needs during this 8¼ year planning cycle. HCD should disregard this proposal. Existing need is manifestly distinct from future need—planning to meet existing need as soon as possible should be a top priority if regional planning is to have any utility.

Culver City believes that regional problems require regional solutions that are firmly grounded in evidence and guided by strong methodology. The Consultation Package is deficient in this regard. The housing crisis is real, and it is detrimentally impacting the community every day. Culver City urges HCD to make a more realistic determination of the region's housing needs. If you have any questions, or if you wish to discuss this further, please contact me at meghan.sahli-wells@culvercity.org or at (310) 845-5831.

Sincerely,


Meghan Sahli-Wells
Mayor

cc: The Honorable Gavin Newsom, Governor of California
The Honorable Holly J. Mitchell, Member of the State Senate
The Honorable Sydney Kamlager-Dove, Member of the State Assembly
The Honorable Mark Ridley-Thomas, Member of the Los Angeles County Board of Supervisors
Southern California Association of Governments, RHNA Subcommittee
Westside Cities Council of Governments Board of Directors
The Honorable Members of the City Council
John M. Nachbar, City Manager
Sol Blumenfeld, Community Development Director