



## CITY OF BEVERLY HILLS

455 NORTH REXFORD DRIVE • BEVERLY HILLS, CALIFORNIA 90210

**John A. Mirisch, Mayor**

August 23, 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 Beverly Hills Comments**

Dear Chair Huang,

The City of Beverly Hills recognizes the housing affordability crisis in the State of California and the role that local jurisdictions play in developing effective solutions. The City has reviewed the Proposed Allocation Methodology for the sixth cycle RHNA provided by Southern California Association of Governments (SCAG). On behalf of the City of Beverly Hills, I write to you with several suggestions to develop an alternate methodology that our City believes will provide the most rational and effective RHNA allocation. While the City finds “Option 3” to be the most acceptable of the methodologies presented, due to the fact this methodology uses local input as the main factor in determining RHNA allocation, we feel that this methodology falls short. Therefore, the City requests that SCAG examine developing and adopting an alternate option that considers job growth and encourages cross-jurisdictional partnerships.

In the City of Beverly Hills, 63 percent of the housing units are located in multi-family buildings. The majority of this multi-family housing is subject to rent stabilization, which helps ensure that the City maintains a wide variety of housing types for our residents. In addition, the City is entirely built out, with almost no vacant land upon which to construct new housing and has experienced very little population and employment growth over the last few decades. Due to these factors, almost any new multi-family units that are constructed would be displacing existing residents, most of whom are in rent controlled units.

The City of Beverly Hills believes RHNA allocation numbers should link new housing production with job production in order to ensure that existing jobs/housing imbalances are not further

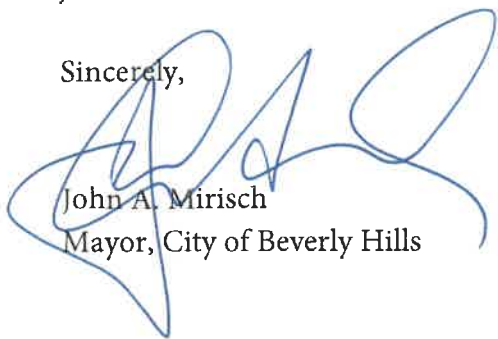
exacerbated. Merely locating affordable housing along high quality transit corridors does not guarantee that a person will be living closer to where they are employed, however, linking housing and jobs creation may help address this imbalance. Therefore, our City requests SCAG consider the number of new jobs created within a jurisdiction as a factor for determining the need for a city to build new affordable housing as well as predicted population growth.

The City also requests that SCAG allow jurisdictions to count units built during the current housing cycle that are in excess of current RHNA allocation toward 6<sup>th</sup> cycle requirements. This would prevent jurisdictions from delaying important housing projects that could be constructed in the next two years in order that they may receive RHNA credit in the 6<sup>th</sup> cycle period.

Our City has long supported the need for regional cooperation for developing solutions for transportation, water, and homelessness issues. Our City is also supportive of a regional solution for affordable housing. We encourage SCAG to work with the State to examine allowing two or more jurisdictions to jointly develop affordable housing projects on a mutually agreed upon site within one of the jurisdictions and allow all participating jurisdictions to gain RHNA credit from such a development. The City of Beverly Hills actively seeks sites upon which to develop affordable housing within the City. Due to the high cost of land in the City, it is often prohibitively expensive to obtain land and construct a meaningful number of affordable units. Allowing partnerships could allow jurisdictions to combine funding and develop the most mutually beneficial housing projects that will ultimately provide much needed affordable housing in the region.

For these reasons, the City of Beverly Hills requests your consideration of an alternative methodology that links RHNA with new job creation and encourages partnerships between jurisdictions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'John A. Mirisch', is written over the typed name and title. The signature is fluid and cursive, with a large loop at the end.

John A. Mirisch  
Mayor, City of Beverly Hills