

SUBMITTED ELECTRONICALLY

August 20, 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,

The City of Rancho Palos Verdes appreciates the opportunity to provide the following comments on the proposed RHNA methodology for your consideration. Since the 2013 adoption of the Housing Element, the City has actively engaged in implementing the goals and policies of the Housing Element including the creation of housing units to meet designated RHNA allocations. More specifically, the City has provided for housing units in various income levels and anticipates that remaining units will be provided as identified in the City's Housing Element.

The City joins other jurisdictions in expressing concerns as to the feasibility of meeting new RHNA allocations under the methodology options proposed by the Southern California Association of Governments (SCAG). While the City supports the development of housing units that improve the availability of affordable and safe housing throughout the region, the City also promotes housing that reflects the City's character and recognizes development constraints and hazards.

The City requests that SCAG consider the following challenges that face the City, as it considers proposed methodology options for the upcoming 6th RHNA cycle:

1) Very High Fire Severity Zone

Approximately 97% of the City of Rancho Palos Verdes is located within the Very High Fire Severity Zone, as classified through the California Department of Forestry and Fire Protection. Senate Bill 35 recognizes the hazards associated with such classifications by exempting mandatory density provisions for very high fire severity zone communities. The City requests that this designation weigh heavily on the methodology option selected for Rancho Palos Verdes.

2) Geologic Hazards

The Portuguese Bend Landslide Complex (PBLC), which is the largest fastest moving landslide in North America, is located along the south central section of the Palos Verdes Peninsula entirely within the City of Rancho Palos Verdes. The terminus of the active landslide complex, and generally the southwest boundary of the PBLC is the Pacific Ocean. The PBLC is divided into two parts with the main landslide having an area of about 190 acres and the other segment having an

area of about 70 acres. The PBLC moves at various rates and over the last several decades has resulted in significant infrastructure damage to homes, utilities, and roadways. The City has expended nearly 50 million dollars over the years repairing and maintaining the damage and addressing the overall technical and administrative issues associated with managing such a complex problem. As a result of geologic and geotechnical studies, the City prohibits the construction on vacant lots within the entire PBLC through with the establishment of a landslide moratorium area that has been codified since 1978.

3) Wildlife and Habitat Preservation

The City of Rancho Palos Verdes includes area of lands that are protected from development as a result of Federal and State programs. More specifically, the City has adopted a Natural Community Preservation Plan and Habitat Conservation Plan (NCCP/HCP or Plan). The Plan was prepared to maximize the benefits to wildlife and vegetation communities while accommodating appropriate economic development within the City. The City's primary conservation strategy is to dedicate 1,402.4 acres of habitat protection for the NCCP/HCP Preserve assembly. The dedication includes Existing Public Lands that are currently owned by the City (1,123.0 acres) and the Palos Verdes Peninsula Land Conservancy (PVPLC) (20.7 acres). The remainder of the Preserve is comprised of 258.7 acres of City owned land or land that will eventually be owned by the City which has been previously dedicated for conservation as mitigation for certain private projects and will be added to the Preserve. The City also includes the Abalone Cove, which contains a State-designated Ecological Preserve with important natural marine resources at the bottom of the Portuguese Bend landslide area.

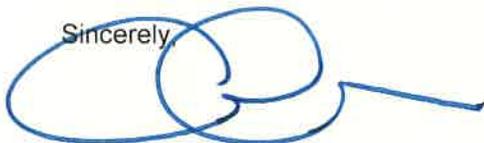
The City's NCCP/HCP is unique to Los Angeles County, as it is the only such Plan in the County. It benefits the natural environment and protection of species, including listed endangered species, as well as passive recreational opportunities to the general public. The approximate 1,400 acres of undeveloped vacant open space that make up the Palos Verdes Nature Preserve is encumbered with conservation easements and deed restrictions that prohibit development in perpetuity which should be factored in the RHNA methodology applied to the City.

In addition to the large areas of the City dedicated to wildlife and vegetation communities, the City also is home to three federal facilities. These include the Point Vicente Lighthouse and Coast Guard Station (29 acres), the United States Air Force and Federal Aviation Administration Radar Station (11 acres) on San Pedro Hill, and a World War II bunker and Coast Guard antenna site (4 acres) at Point Vicente Park/Civic Center.

The City would like to thank the Chair and Committee in advance for considering the unique challenges and physical constraints that face Rancho Palos Verdes, and asks that such factors weigh heavily in considering the methodology for the upcoming 6th RHNA 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
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Octavio Silva, Senior Planner