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From: Matthew Hinsley [REDACTED]
Sent: Monday, September 9, 2019 10:45 PM
To: Regional Housing
Cc: Bill Brand; Laura Emdee
Subject: Submitted Comments on the Proposed RHNA Methodology

Hello,

Thank you for the opportunity to comment on the Souther California Area Governments (SCAG) development of the Regional Housing Needs Assessment (RHNA) 6th cycle methodology. I am a resident of Redondo Beach and I have been born and raised in California and lived in southern California since 2008. First I do agree with SCAG's goal and desire to improve the urgent need for housing and to do so in an equitable and fair manor for all communities that make up the Souther California region.

Overall, although an improvement in the transparency over the 5th cycle, I do not believe any of the 3 options proposed for the 6th cycle are acceptable or equitable for a multitude of reasons to be presented below. All 3 options are woefully inadequate in considering options beyond the narrow view of the modifiers used (such as HQTAs, income categories, building activity) in all 3 of the RHNA methodologies presented. Instead of improving the housing for residents of the Southern California all 3 methodologies could actually make things worse, more inequitable and degrade those goals that listed as a part of the SCAG RHNA process.

The first 3 Objectives of RHNA are:

- 1) To increase the housing supply and mix of housing types, tenure and affordability within each region in an equitable manner
- 2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns
- 3) Promoting an improved intraregional relationship between jobs and housing.

In the provided document "RHNA Methodology Public Hearing PowerPoint Presentation.pdf" the example given for "City A" and "City B" will be examined to show that it is possible and even likely that inequity will result based on all of the proposed methodologies.

City A: Urbanized / Within County X / Most of population is with / Population: ~ 65,000 / Higher concentration of lower income households than other parts of the county.

City B: Suburban community / Within County Y / No HQTAs within jurisdiction / Population: ~ 65,000 / Higher concentration of high income households than other parts of the county.

For example, the stated objective of RHNA 1) To increase the housing supply and mix of housing types, tenure and affordability within each region in an equitable manner.

In the example provided by SCAG if the 2 communities "City A" and "City B" both have a population of 65,000 and in the example Option 1 City A Total RHNA was 1,608 and City B Total RHNA was 2,053. But not in consideration is the density of the current city. If City A exists in 4 square miles and city B exists in 12 square miles the impact to the city would be vastly different. Density is once major missing component that should be a solely defining but should be taken into account in a more significant manor. Especially if a

community has higher than county average density. Even if sub-county regions were taken into account to not compare communities on one side of the county from the other which may lead to its own inequity.

Additionally for example, the stated objective of RHNA 2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns.

if both cities in the example have a population of 65,000 but City A has zoning that is majority is built at to zoned for higher density housing, due to its smaller size, that should be taken into account in the equitable distribution but is not. If City B is predominantly planned for R-1 residential and exists in 3 times the land mass it should have a compensatory allocation of housing. This is not to say that suburbs or further out communities should have increased housing because that would exacerbate the job-housing imbalance which would be covered down below. But if neighboring communities have such a difference then that should be factored into the housing assessment to aid in the equity.

Finally for example, the stated objectives of RHNA 3) Promoting an improved intraregional relationship between jobs and housing.

There is currently no significant accounting in any of the 3 RHNA methodologies that accounts for an existing or future jobs-housing imbalance. This is a clearly listed goal but can actually be made significantly worse using any of the 3 proposed methodologies. Back to the examples, looking at Methodology Option 1, the Total Housing need of “City A” of 1,608 and that of “City B” is 2,053. But what if the cities are 30 miles from each other and City B has a large number of job centers and is a job rich city. Looking at the number of houses divided by number of jobs. If for example City A has a housing / jobs ratio of 0.75 (1 house per 0.75 jobs) but City B has a housing / jobs ration of 4.5 (1 house per 4.5 jobs) by using Option 1 (or Option 2 or Option 3) and requiring similar amounts of housing allocation for a job poor community and a job rich community SCAG may actually make the housing-jobs imbalance worse. Implementing any of the 3 options presented could result in the Vehicle Miles Travelled (VMT), not seriously considered in any of the RHNA methodologies presented, being significantly worse especially if the housing is built as planned and the jobs remain the same allocation. Again, this should not be the only consideration but a housing-jobs factor should definitely be weighted in the 6th cycle methodology to meet the stated goal 3) as currently none of the methodologies seriously account for this stated goal.

Additionally there are other minor revisions to the RHNA 6th cycle methodology to comment on.

Some communities in Southern California are park poor and that leads to a reduced quality of life and an unhealthier lifestyle. By adding more housing and not considering this important factor it may create more housing when actually more park space is what is needed. The more housing actually makes that condition worse.

Option 1 Step 2b Future Vacancy Need uses a standard vacancy rate of 1.5% for owner households and 5% for renter households. This number is not a one size fits all and the 6th cycle methodology may award more housing to communities that have a tight housing supply and a vacancy rate lower than RHNA projected vacancy.

SCAG RHNA 5th cycle inequitable housing allocation

Finally, in RHN 5th cycle methodology my community was the shining example of the lack of transparency and the inequity on the housing allocation by SCAG. The city of Redondo Beach 5th cycle allocation was ~ 1400 units for a population of ~ 67,000. The neighboring communities of small size, less density had allocations of 2, 38, 50, etc. The neighboring city of Torrance had two times the population, 3 times the land mass and an allocation only a few hundred more the Redondo Beach. The reason I mention the 5th cycle RHNA

methodology is to highlight in inequality and unfair allocation that can occur when all the complicated and complex factor are not taken into account in assigning housing need now and in the future.

Thank you again for the opportunity to comment and I look forward to a revised methodology to incorporate some of these options to finally create an equitable housing allocation that can meet the stated goals.

Respectfully,

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