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September 12, 2019

Southern California Association of Governments
900 Wilshire Blvd, Suite 1700
Los Angeles, CA 90017
Via Email: housing@scag.ca.gov

RE: Comment on Draft Regional Housing Needs Assessment (RHNA) Methodology Options

Dear Ms. Johnson:

The City of Lomita appreciates the opportunity to provide SCAG with comments regarding the three proposed methodologies for the 6th cycle Housing Element RHNA allocation. The City reiterates its concerns over the impacts any of the three methodologies will have on the character and nature of our community, we believe option three most equitably and realistically distributes new housing development across the region where it can most realistically be achieved and will be most likely to have the greatest impact on the State's housing crisis.

Our review of the proposed methodologies shows that options one and two could have a drastic impact on the City of Lomita which is only two square miles yet has a population four times more dense than the rest of Los Angeles County and 22 times more than the SCAG region as a whole.¹

On August 22, 2019 City staff attended the RHNA subcommittee meeting where the three proposed methodologies were presented. That same day HCD released their RHNA determination for the SCAG region at 1,344,740 total housing units. This is significantly more than the housing units anticipated by SCAG when the RHNA methodologies were created. The housing unit allocation given to SCAG by HCD could have a devastating impact on older, denser communities such as Lomita. With few exceptions, Lomita is entirely built out and the City could not identify enough available sites to accommodate option one's allocation of 1,193 units or option two's 1,443 units without drastic amendments to the City's general plan characteristics that would irrevocably change the make-up of our community. The City currently has 8,103 household units; Option two represents almost 20% growth in the entire City's number of household units over the next ten years. Growth of this magnitude will have significant impacts on both the infrastructure of the City, as well as the nature and character of our small town.

¹ According to SCAG's 2019 Local Profiles, the City of Lomita has a total population of 20,715 persons which equates to 10,846 persons per square mile. Comparatively, Los Angeles County has a population density of only 2,518 persons per square mile while the entire SCAG region is only 490.

In addition to opposing options one and two of the RHNA methodologies, the City encourages SCAG to appeal the RHNA allocation given from HCD. The issued RHNA allocation has a severe impact on all cities across the SCAG region. The allocation puts the City of Lomita, and most other cities, in a position where they may not be able to certify their 6th cycle housing element.

Lastly, it is important to note that none of the methodologies recognize all the good work that cities have been doing to address this issue. The City understands that housing costs are high and that there are “existing need factors” such as over-crowding and cost burden. In fact the City has exceeded its 5th Housing Element Cycle allocation in three of the four income categories. Further, the City recently permitted a residential project at 88 units per acre and has one of the least restrictive ADU processes in the State. The City of Lomita is doing its part to address the housing crises, but, decades of pent up demand cannot be addressed in one housing element cycle, and those communities who have made significant progress in meeting these challenges should be recognized and not punished. HCD’s allocation of over 50% of the housing units going towards “existing need” is simply not practical and places an unrealistic burden on local neighborhoods. Considering the City of Lomita will exceed its 5th cycle allocation by over 250 units, it is respectfully requested that those cities exceeding their allocation receive credit and recognition for those housing units as part of the 6th cycle. This will ensure that units in the pipeline are constructed as expeditiously as possible to address the current housing need regardless of the housing element cycle.

Thank you again for SCAG’s time and effort on this complex and challenging issue. The City looks forwards to working in a collaborative environment with SCAG to ensure that any allocation is fair and equitable.

Sincerely,



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CC: Mayor and City Council
Ryan Smoot, City Manager