

Lennox Chaiveera

From: Brandy Forbes <Brandy.Forbes@redondo.org>
Sent: Tuesday, August 9, 2022 3:08 PM
To: Regional Housing
Subject: RHNA Comments to SCAG from Redondo Beach
Attachments: RHNA Subcommittee Letter_08.20.19 for Council EXECUTED.pdf; Redondo Beach RHNA Appeal PowerPoint_01.13.21.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

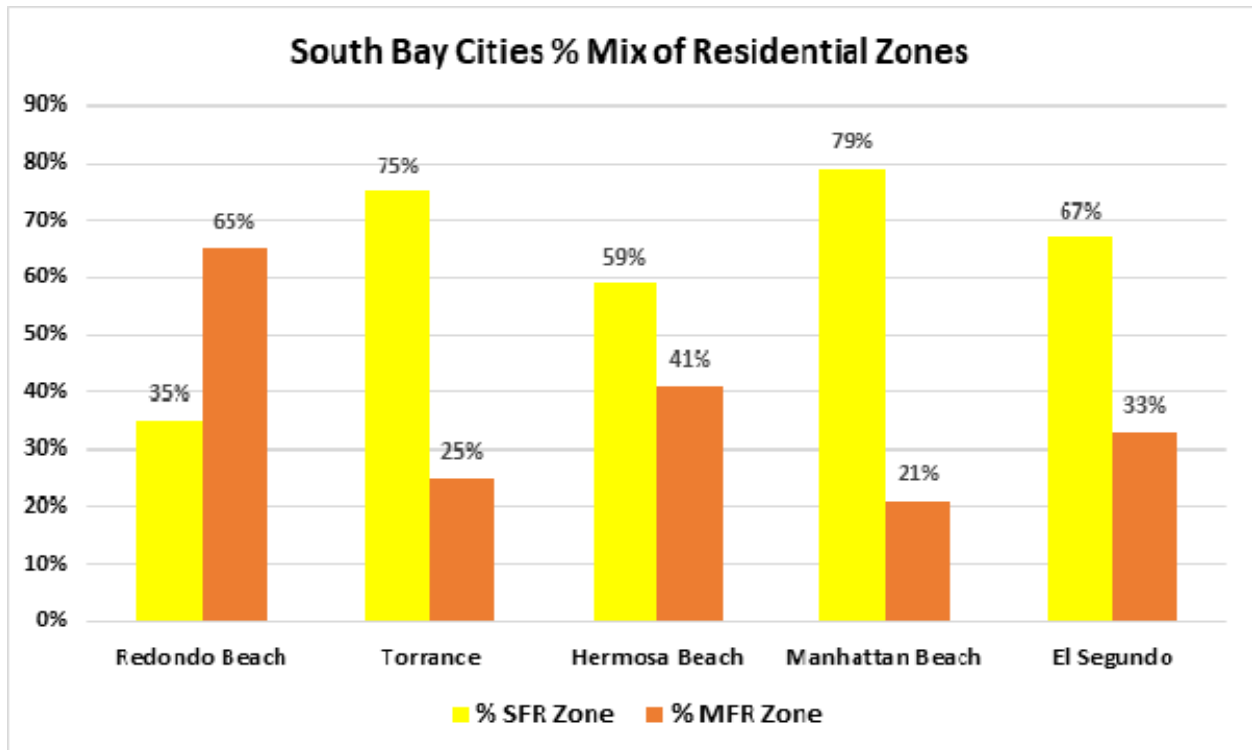
SCAG,

Please accept the following comments about the RHNA process as part of the RHNA reform input efforts your team is conducting. The City of Redondo Beach has provided these various comments throughout the 6th Cycle RHNA process, specifically during the methodology public comment period in 2019 and the RHNA appeal process in 2020-2021. SCAG's RHNA reform input process is an opportunity for the City to provide the comments comprehensively. The main comments are provided below, as well as prior communications attached.

- Related to SCAG's methodology, the City of Redondo Beach has repeatedly noted that the methodology should have a local zoning factor included, to acknowledge those municipalities that have already adjusted their zoning for more density. Instead the methodology presses for cities that have already up-zoned have to increase their density even more than cities that have not taken steps previously to include more housing.

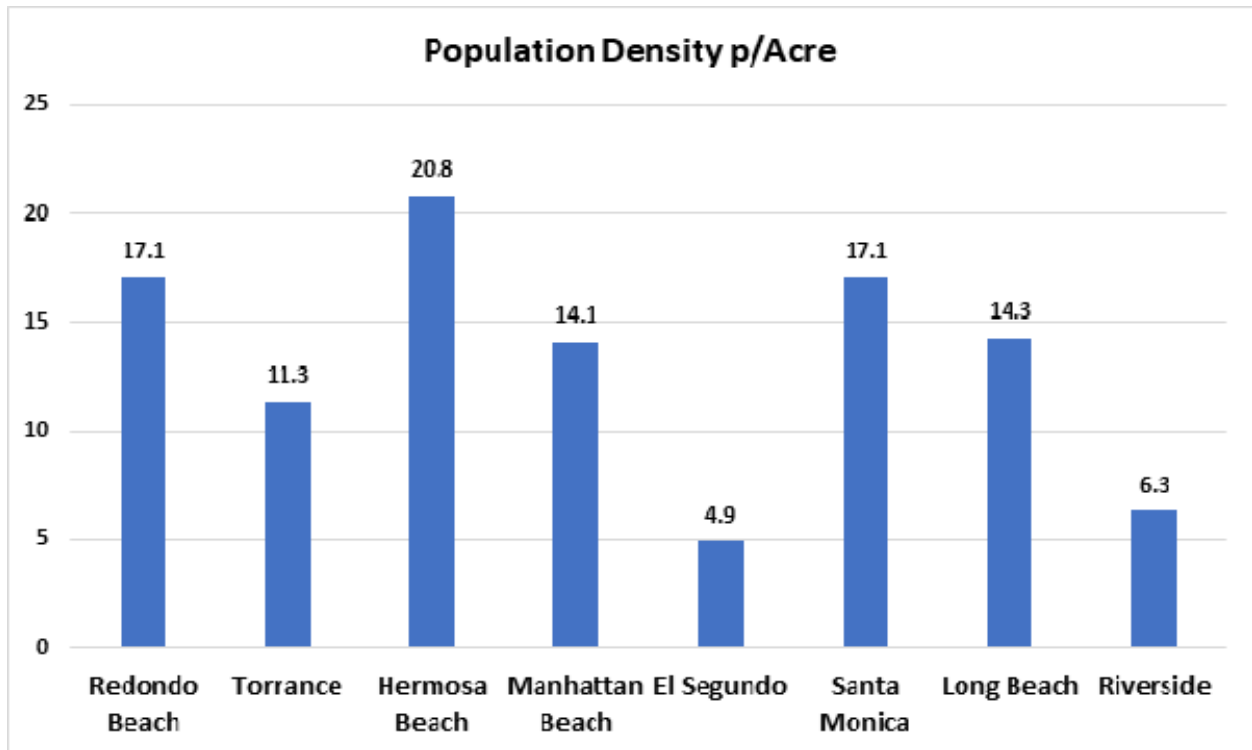
Redondo Beach has long embraced its responsibility to provide residential development at much higher densities than what the City was originally intended/designed to accommodate. Historically the City was predominately a single family suburban residential community with commercial corridors to support the service and retail needs of surrounding neighborhoods. This is evidenced in the lot size and land use patterns of the City's zoning map. In review of the City's zoning map there are numerous examples of lot sizes and lot patterns that appear identical; however, the zoning of these seemingly identical subdivisions is now a mix of R-1 (Single Family Residential) and R-2/R-3 (Multiple Family Residential).

Over prior decades Redondo Beach has converted/up-zoned a majority of its originally planned Single Family residential neighborhoods into Multiple Family zoned and developed neighborhoods. This is unique in our South Bay Cities Council of Governments (SBCCOG) subregion. Many of the surrounding jurisdictions within the SBCCOG subregion have taken a different approach, as evidenced by their current zoning maps that largely preserve much of their Single Family residential zones/neighborhoods, resulting in a much smaller percentage of their residentially zoned properties having Multiple Family designations and densities. A factor should be added to the methodology that takes into consideration the prior efforts of those municipalities that have already conducted lot splits and up-zoning to accommodate more residential, embracing their responsibility to provide all types of housing.



City staff raised this issue at the RHNA appeal hearing and the SCAG appeal committee all agreed that we should share this feedback with SCAG as RHNA reforms are considered.

- Another recommendation regarding the SCAG methodology is that there should be a factor to recognize the existing density of local jurisdictions. Existing population density of local communities should be a consideration with distributing the RHNA. According to SCAG data, the City of Redondo Beach's population density is 17.1 persons per acre, which doubles the regional average of 8.3 persons per acre. Redondo Beach ranks 21st among SCAG's 197 member cities/counties. As a densely populated and built-out community, the City already has higher burdens on its infrastructure, including roads, open space and parks, schools, sewer and drainage facilities, and other services. Without considering a factor for existing density, the jurisdictions with higher population density could be disproportionately impacted. By incorporating a "density cap" or "density credit" factor, potentially severe impacts and costs associated with overburdened infrastructure and resources could be avoided.

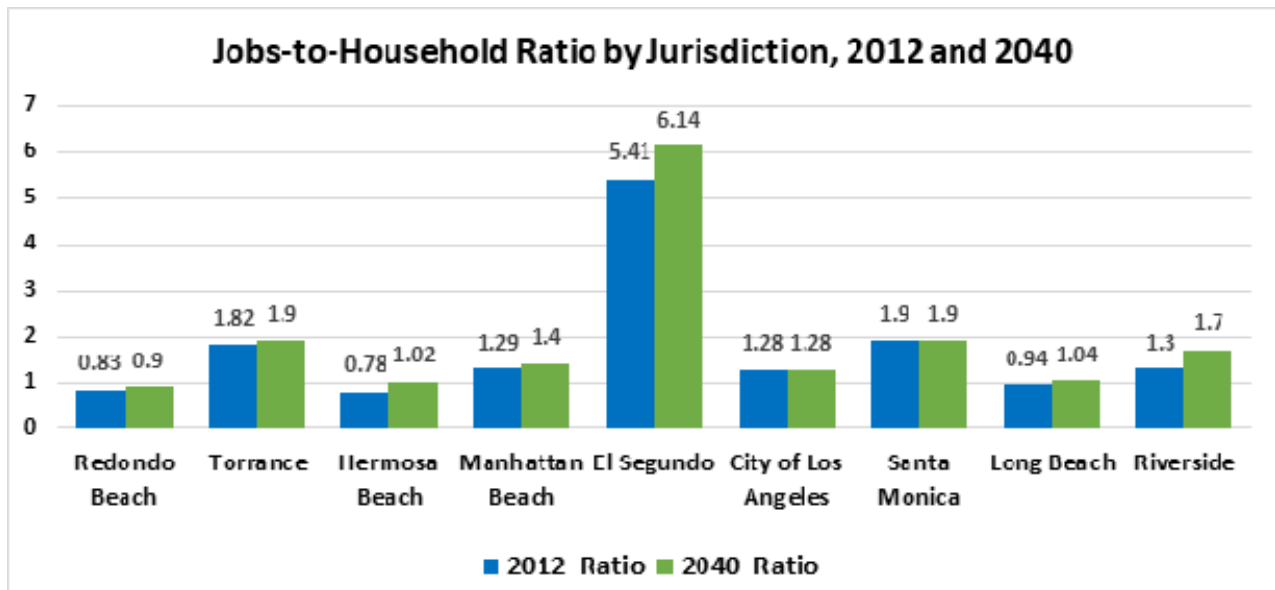


- An additional SCAG methodology comment is regarding how the HQTAs factor is implemented. If an HQTAs area already has significant housing, this factor required even more proportionally. But in the HQTAs where there was very little housing, the additional housing requirement for this factor was minimal. This imbalance keeps the jobs in the job areas and the housing in the already developed housing areas, rather than creating a mix of uses in all HQTAs areas. This will continue to perpetuate the traffic and environmental impacts in the region.
- One final methodology recommendation is regarding a jobs-to-household ratio factor. According to the most recent SCAG Regional Transportation Plan (2016), Redondo Beach had a Jobs-to-Household Ratio of 0.83 in 2012. This indicates that there were only approximately 0.83 citywide jobs per Redondo Beach household, one of the lowest ratios in the South Bay with the exception of Hermosa Beach (see table below).

Jobs-to-Household Ratio by Jurisdiction, 2012 and 2040

Geography	2012 Emp	2012 HH	2012 Ratio	2040 Emp	2040 HH	2040 Ratio
Redondo Beach	24,000	29,000	0.83	29,800	33,000	0.9
Torrance	102,300	56,100	1.82	117,600	62,000	1.9
Hermosa Beach	7,400	9,500	0.78	10,000	9,800	1.02
Manhattan Beach	18,000	14,000	1.29	20,700	14,800	1.4
El Segundo	38,400	7,100	5.41	45,400	7,400	6.14
City of Los Angeles	1,696,400	1,325,500	1.28	2,169,100	1,690,300	1.28
Santa Monica	89,600	47,100	1.9	103,700	53,900	1.9
Long Beach	153,200	163,800	0.94	181,700	175,500	1.04
Riverside	120,000	92,400	1.3	200,500	118,600	1.7

Sources: SCAG 2016 RTP; BAE, 2017



According to SCAG forecasts, Redondo Beach's Jobs-to-Household Ratio is expected to only rise to 0.90 by 2040. In cities like Redondo Beach with a low ratio of jobs to housing units, local residents have fewer opportunities to work close to home, and more will commute outside the city limits to work elsewhere.

The State regulations regarding RHNA actually require that each member jurisdiction's existing and projected jobs and housing relationship is taken into consideration when developing the RHNA allocation. Jobs-to-Household Ratios should also be considered where adding housing in a higher density city with a lower than average Jobs-to-Household Ratio would make the city's Jobs-to-Household Ratio even worse and would further reduce the developable areas for job producing uses. The data clearly demonstrates that Redondo Beach, in order to reduce overall Vehicles Miles Traveled (VMT) consistent with SCAG's 2020 RTP/SCS, needs to develop more land uses in support of local professional jobs that are consistent with the skills of the City's resident and

future populations. However, in order to accommodate RHNA, the City is having to rezone many of the commercial areas to residential, thus exacerbating the jobs to household imbalance.

- Addressing HCD’s requirements for meeting RHNA, there needs to be more flexibility in what will be counted toward housing. Cities are required to allow for lot splits and two on a lot development through SB9, where the noted intent of that law was to encourage the development of more *affordable* housing, yet the eligible sites cannot be counted toward RHNA. As well, inclusionary housing ordinances are not taken into consideration when determining affordable (very low and low) housing capacity. The criteria for what can count toward meeting the low and very low RHNA obligations have become so stringent that there is little room for creativity. Finally, the types of housing don’t all count toward meeting RHNA. For example, although Assisted Living is a permanent residence for those located in those units, these are not counted toward meeting the RHNA obligation. More flexibility in what types of housing can count toward RHNA capacity is needed.

The City appreciates your consideration of this feedback. Let me know if you have any questions or need clarification on these comments.

Sincerely,

Brandy Forbes
Community Development Director

Department of Community Development
415 Diamond Street
Redondo Beach, CA 90277
(310) 318-0637 x2200
brandy.forbes@redondo.org
www.redondo.org



Please note that email correspondence with the City of Redondo Beach, along with attachments, may be subject to the California Public Records Act, and therefore may be subject to disclosure unless otherwise exempt. The City of Redondo Beach shall not be responsible for any claims, losses or damages resulting from the use of digital data that may be contained in this email.