

Jeff Wood  
Vice Mayor

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Council Member



Todd Rogers  
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October 26, 2020

Kome Ajise, Executive Director  
Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, CA 90017

## **CITY OF LAKEWOOD - REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) APPEAL**

Dear Mr. Ajise:

The City of Lakewood appreciates the opportunity to submit this letter requesting an appeal of the RHNA for the 6<sup>th</sup> Housing Cycle. Lakewood continues to be committed to facilitating and promoting the development of quality housing throughout the city. As we commence our Housing Element update process, we look forward to examining our current housing policies and implementing a comprehensive approach to increase the available housing supply at all income levels. However, the exponential increase in the 6<sup>th</sup> cycle RHNA allocation compared to the previous cycle raises serious questions about our ability to meet our allocation of 3,914 units. The inability to meet this allocation would result in the non-certification of our Housing Element. As such, the City of Lakewood is submitting this request for an appeal.

### **SECTION 1: BASES FOR APPEAL**

- 1) Local Planning Factors and/or Information Related to Affirmatively Furthering Fair Housing:
  - Availability of land suitable for urban development or for conversion to residential use
- 2) Changed Circumstances

### **SECTION 2: BRIEF STATEMENT ON WHY THIS REVISION IS NECESSARY TO FURTHER THE INTENT OF THE OBJECTIVES LISTED IN GOVERNMENT CODE SECTION 65584**

#### **I. Introduction**

The City of Lakewood ("City") appeals the City's proposed allocated share of the regional housing need included as part of SCAG's Draft RHNA Plan. The City's draft allocation is 3,914 units, and the City is requesting a reduction to **2,500 units**. This revision is necessary to further the intent of the objectives listed in Government Code Section 65584(d) for the following reasons:

- A. SCAG failed to consider local planning factors, namely the availability of land suitable for urban development or for conversion to residential use; and
- B. Changed circumstances brought about by the recent global COVID-19 pandemic.

# Lakewood



## **II. Bases For Appeal**

### **A. Availability of land suitable for urban development or for conversion to residential use.**

The City of Lakewood is a built out community, with very few vacant sites suitable for future land development. Since its incorporation in 1954, the both population and total households have remained relatively steady. The Department of Finance estimates the current population to be 81,352, and total households are 25,957. With a total area of 9.5 square miles, Lakewood's population density of 8,563 persons per square mile is greater than both the City of Los Angeles (8,008 persons/sq. mi.) and Los Angeles County (7,372 persons/sq. mi.).

The City is primarily a residential community, with a mix of predominantly single-family homes and multi-family uses. Only 7.67% of the total land use dedicated for commercial and industrial uses. This small percentage of land use dedicated for non-residential uses makes it difficult to develop for large numbers of housing units.

The City's 2013-2021 Housing Element, identified 16 vacant sites as suitable for development. Of these, 5 have been developed for housing and 11 still remain vacant, however 5 of these are City-owned and are currently in the process of developer selection for multi-family housing.

As discussed above, there is a very small amount of commercial or industrial sites that could be considered for future residential development, and of these many are restricted for residential use due to their proximity to the Long Beach Airport, which imposes restrictions on residential use. Other than these larger restricted sites, there are very few under-utilized parcels that would be suitable for residential development of any significance.

As a densely populated and built-out suburban community, Lakewood has a high burden on its infrastructure and roads, open space, schools, and other services. Yet, unlike many jurisdictions that have a diverse land use mix, Lakewood is primarily a residential community, with only 7.67% of land use designated as commercial or industrial. Unlike other jurisdictions, Lakewood does not have underperforming mid-block commercial centers that can be converted to housing, as our commercial development is located on small corner nodes. The proposed allocation of units will prove detrimental, as we would be forced to designate our already small percentage of non-residential land uses to future residential development.

Furthermore, the City anticipates that the rising popularity of e-commerce, coupled with the displacement of existing commercial, office, and industrial uses to accommodate housing will negatively impact job growth within the City and will invariably lead to a net reduction in employment within the City over the next several decades to 2045. This factor needs serious consideration in order for meaningful development of housing to actually occur, not just within the City, but within the region as a whole.

Accordingly, the City requests that its allocation be revised downward to reflect this local planning factor and constraint on development of housing, as previously identified above in Section II (B).

### **B. Changed Circumstances**

The current 6<sup>th</sup> Housing Cycle is the culmination of several years of planning and analysis focused on developing a RHNA to address the need for new housing production statewide. The case for developing ever more housing has been championed by many in Sacramento, in particular Governor Newsom, who stated that his goal was to build 3.5 million new homes by 2025. However, Governor Newsom later clarified his stance and admitted that his stated goal was a "stretch goal" and that the state release a more



pragmatic estimate of housing needs by region. The for the SCAG region, the “pragmatic” estimate was anything but. The regional determination of 1.34 million housing units combined with the inequitable RHNA methodology, which does not include local input, are setting up local jurisdictions for failure to comply with state housing law.

Likewise, the recent COVID-19 pandemic has added an unforeseen challenge in meeting our regional housing goals. As the 6<sup>th</sup> Housing Cycle planning period was drawing to a close, the world was struck by a global pandemic that has resulted in the deaths of 223,000 thousand in the United States and over 1.14 million worldwide. This drastic change in circumstances should give us reason to pause and consider the long term implications of pushing forth on such a dramatic increase to our overall housing production mandates. Notwithstanding some examples of highly dense cities being able to cope with COVID-19, it is not unreasonable to suggest that greater density overall can lead to a greater possibility of transmission.

There is still much to be learned about the relationship between the spread of the virus and overall housing density, particularly in an area as large and dense as the SCAG region. Rather than just ask for a reduction to Lakewood’s allocation, we would ask that SCAG consider objecting, once more, to the regional determination of 1.34 million housing units. Because of the current COVID-19 pandemic, and the public’s concerns over compromised public health and safety, the plan to dramatically increase housing density should be put on hold and re-analyzed based on the changed circumstances.

### **III. These Revisions Further The Government Objectives Under Government Code Section 65584.**

The City of Lakewood is requesting consideration of a revision to its 6<sup>th</sup> RHNA cycle allocation in an effort to ensure that the City is able to reasonably attain and further the objectives of Government Code Section 65584. The City aims to increase its housing supply and diversify the type of housing available throughout the City; however, the limitations of a built-out urban community restrict some of the potential to achieve these goals.

This request for a new assessment of its 6<sup>th</sup> RHNA cycle allocation is a result of the City’s sincere and earnest approach at developing a successful Housing Element update. The City is aware of the existing constraints that exist for this community and the various factors that contribute to successful housing developments.

This request is made with understanding of the difficult position that HCD has created for SCAG by not accepting the September 18, 2019 letter and its valid interpretation of Government Code 65584.01(a) and 65584.01(c)(2)(B). One goal of Government Code Section 65584 is to promote infill and socioeconomic equity in Housing Element Updates. This is something that the City supports and seeks to attain however, the City’s goal is not only to promote housing to promote quality housing that incorporates the mixed housing types into the community overall.

### **SECTION 3: BRIEF DESCRIPTION OF APPEAL REQUEST AND DESIRED OUTCOME**

The City of Lakewood’s existing constraints and the adoption of several new housing bills (SB35, SB166, AB1397) foster a challenge to the successful implementation of the Housing Element Update. The City is committed to promoting the development of a mix of quality housing units throughout the community to satisfy its share of the need for residential growth in the region but, it does want to ensure that it is planning for its fair share of the need. Based on what we expect will be thorough Housing Element analysis of our existing zoning code, identification of potential housing sites, and continued approval of accessory dwelling units, we anticipate that we will be able to reasonably plan for the development of 2,500 new housing units during the life of the 6<sup>th</sup> Cycle.

**SECTION 4: NUMBER OF UNITS REQUESTED TO BE REDUCED OR ADDED TO THE JURISDICTION'S DRAFT RHNA ALLOCATION:**

Reduced: 1,414 units

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The City of Lakewood appreciates SCAG's efforts on the RHNA process to date and requests that our appeal be considered accordingly. We look forward to your determination and to continuing this cooperative process together. Should you have any questions regarding our appeal, please contact Abel Avalos, Director of Community Development, (562) 866-9771, ext. 2301, or [aavalos@lakewoodcity.org](mailto:aavalos@lakewoodcity.org).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Thaddeus McCormack', with a long horizontal flourish extending to the right.

Thaddeus McCormack  
City Manager