

Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form
All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.
Appeals and supporting documentation should be submitted to housing@scag.ca.gov.
Late submissions will not be accepted.

Date:
10/26/20

Jurisdiction Subject to This Appeal Filing:
(to file another appeal, please use another form)
City of La Mirada

Filing Party (Jurisdiction or HCD)
City of La Mirada

Filing Party Contact Name
Gabriel Bautista

Filing Party Email:
gbautista@cityoflamirada.org

APPEAL AUTHORIZED BY:

Name: Jeff Boynton

PLEASE SELECT BELOW:

- Mayor
- Chief Administrative Office
- City Manager
- Chair of County Board of Supervisors
- Planning Director
- Other: _____

BASES FOR APPEAL

- Application of the adopted Final RHNA Methodology for the 6th Cycle RHNA (2021-2029)
- Local Planning Factors and/or Information Related to Affirmatively Furthering Fair Housing (See Government Code Section 65584.04 (b)(2) and (e))
 - Existing or projected jobs-housing balance
 - Sewer or water infrastructure constraints for additional development
 - Availability of land suitable for urban development or for conversion to residential use
 - Lands protected from urban development under existing federal or state programs
 - County policies to preserve prime agricultural land
 - Distribution of household growth assumed for purposes of comparable Regional Transportation Plans
 - County-city agreements to direct growth toward incorporated areas of County
 - Loss of units contained in assisted housing developments
 - High housing cost burdens
 - The rate of overcrowding
 - Housing needs of farmworkers
 - Housing needs generated by the presence of a university campus within a jurisdiction
 - Loss of units during a state of emergency
 - The region's greenhouse gas emissions targets
 - Affirmatively furthering fair housing
- Changed Circumstances (Per Government Code Section 65584.05(b), appeals based on change of circumstance can only be made by the jurisdiction or jurisdictions where the change in circumstance occurred)

FOR STAFF USE ONLY:

Date _____ Hearing Date: _____ Planner: _____

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Brief statement on why this revision is necessary to further the intent of the objectives listed in Government Code Section 65584 (please refer to Exhibit C of the Appeals Guidelines):

Please include supporting documentation for evidence as needed, and attach additional pages if you need more room.

La Mirada has been completely developed since the 1960s. La Mirada is fully urban with very few remaining vacant and underutilized properties in the City. The great majority of land in the City is currently devoted to residential land uses. Of the City's 3,841 acres, residential uses account for 2,264 acres or approximately 60% of the City's total land area. The remainder of the land area found within the City's corporate boundaries includes commercial uses, industrial uses, parks, schools, and other non-residential-related development. New residential development approaching some 2,000 housing units would require the wholesale elimination of substantial areas of existing non-residential development (commercial and industrial) that currently provides the only source of jobs and the major source of revenue for the City. The only existing sources of open space in the City include the County owned and controlled parkland and recreation areas that are not under the land use control of the City of La Mirada. No vacant land for new residential development is presently available. (Please refer to attached letter dated October 26, 2020)

Brief Description of Appeal Request and Desired Outcome:

Revised 6th Cycle RHNA that reflects a realistic and achievable objective that will not lead to significant dislocation, land use conflicts, and environmental impacts. The 6th Cycle RHNA must be consistent with the City's General Plan buildout. (Please see attached letter dated October 26, 2020)

Number of units requested to be reduced or added to the jurisdiction's draft RHNA allocation (circle one):

Reduced x Added _____

List of Supporting Documentation, by Title and Number of Pages

(Numbers may be continued to accommodate additional supporting documentation):

1. Please refer to attached City letter dated October 26, 2020.

2. City of La Mirada 5th Cycle Housing Element

- 3.

FOR STAFF USE ONLY:

Date _____

Hearing Date: _____

Planner: _____



CITY OF LA MIRADA
DEDICATED TO SERVICE

13700 La Mirada Boulevard
La Mirada, California 90638
P.O. Box 828
La Mirada, California 90637-0828
Phone: (562) 943-0131 Fax: (562) 943-1464
www.cityoflamirada.org

October 26, 2020

Southern California Association of Governments
Housing Division
818 West Seventh Street, 12th Floor
Los Angeles, California 90017

SUBJECT: REVIEW AND APPEAL TO THE 6TH CYCLE REGIONAL HOUSING NEEDS ALLOCATION (RHNA) FOR THE CITY OF LA MIRADA. CITY OF LA MIRADA

Sir/Madam:

The purpose of this letter is to provide your agency with a formal request (appeal) to reconsider the 6th Cycle Regional Housing Needs Assessment (RHNA) figures that have been assigned to our City. La Mirada has been assigned significantly large RHNA numbers both for this cycle and the same was true for a previous cycle. For a previous cycle, the City's assigned RHNA was 1,751 units including 452 units for extremely low and very low income households, 280 units for low income households, 303 units for moderate income households, and 716 units for above moderate income households. For the current 6th Cycle RHNA, the City's assigned RHNA is 1,957 units including 633 units for extremely low and very low income households, 341 units for low income households, 319 units for moderate income households, and 664 units for above moderate income households. The RHNA for the current and the previous RHNA cycles called for a total of 3,709 housing units. Assuming a current average household size of 3.21 persons per unit taken from the most recent U. S. Census American Community Survey, this additional 3,709 housing units would translate into a population increase of nearly 12,000 new residents.

La Mirada was incorporated 1960 and at that time, the City's population was 22,000 persons. Since its incorporation in 1960, La Mirada's population grew by more than 128.7%, from 22,000 residents in 1960 to over 50,000 persons in the mid 2000's. The City's population increased 40% during the 1960s to 30,808 persons in 1970. The 1970's saw continued growth with the population increasing to 40,986 by 1980. The majority of this growth in population, between 1970 and 1980, could be attributed to the annexation of unincorporated areas within the City's designated *sphere of influence*. The 1980's actually saw a slowing in the City's population growth rate with a decline in the overall population being registered between 1980 and 1990. Population growth resumed once again during the 1990s with the 2000 Census counting 46,783 residents continuing to just over 50,000 in 2008. During the second decade of this century, the City's population either stabilized or exhibited a slight decline to 48,183. It is important

to note, that between 1980 and 2020, the City's population grew by 7,197 persons during the past 40 years. More importantly, the 6th Cycle RHNA assumes that this 40 years of population growth will be nearly matched in just eight years between 2021 and 2029 (1,957 units times 3.21 [the average household size] with a resulting population increase of 6,283).

La Mirada is very concerned that outside regional agencies clearly do not understand the many constraints facing the City that will limit potential new development in coming years, especially as it related to the construction of an addition 1,957 new housing units in the next six years remaining of the 6th Cycle RHNA. La Mirada has been completely developed since the 1960s. La Mirada is fully urban with very few remaining vacant and underutilized properties in the City. The great majority of land in the City is currently devoted to residential land uses. Of the City's 3,841 acres, residential uses account for 2,264 acres or approximately 60% of the City's total land area. The remainder of the land area found within the City's corporate boundaries includes commercial uses, industrial uses, parks, schools, and other non-residential-related development.

New residential development approaching some 2,000 housing units would require the wholesale elimination of substantial areas of existing non-residential development (commercial and industrial) that currently provides the only source of jobs and the major source of revenue for the City. The only existing sources of open space in the City include the County owned and controlled parkland and recreation areas that are not under the land use control of the City of La Mirada and are restricted by the state to remain parkland. No vacant land for new residential development is presently available. In fact, any future residential development will be limited to infill development that involves the replacement of either non-residential uses with new housing or the construction of higher density housing on lots containing lower density housing. Since the majority of the residential development is in sound condition, the opportunities for new replacement housing are severely limited.

Unlike many communities in Southern California, the great majority of land in the City is currently devoted to residential land uses. Of the City's 3,841 acres, residential land uses account for 2,264 acres or approximately 60% of the City's total land area. Assuming an average development density of 15 units per acre which corresponds to the City's Medium Density Residential land use designation, a total of 131-acres of land would be required to accommodate the required 1,957 housing units called for in the RHNA assuming that all of the new residential development would correspond to the Medium Density Residential land use designation. At the highest permitted development density (High Density Residential) of 28 units per acre, a total of 70 acres would be required. Again, this latter figure assumes that all of the 1,957 units would correspond to the High Density Residential land use designation. In any event, the land area required to accommodate the RHNA housing units far exceeds the City's current available land

supply of either vacant or underutilized land. This underscores the significant loss of existing housing units associated with any new infill housing development.

SCAG has taken the initiative in identifying our housing need up to 2029 (1,957 units). We respectfully request that SCAG reconsider this 6th Cycle RHNA as it applies to the City of La Mirada for the following reasons:

- Since all of these new units must be provided through the private sector, we question the methodology SCAG utilized in the development of the City's 6th Cycle RHNA. It appears the methodology used was a regionally based model such as a *shift-share model* where the estimated need was broadly assigned across the region. This approach does not take into account the number of key variables that must realistically be considered in evaluating the feasibility of developing nearly 2,000 new housing units over the next six years.
 - Any future RHNA must reflect real demographic trends. SCAG has failed to demonstrate or provide a nexus between a realistic population and housing projection for the City of La Mirada and the RHNA. As we have indicated, the City's population growth has been relatively stable or has actually declined in recent decades due to declines in natural population increases (birth rates/death rates) and in-migration. In fact, the demographic transition that the City has experienced in recent decades is underscored by the significant student enrollment declines that the local Norwalk-La Mirada Unified School District has experienced in recent years.
 - Any future RHNA must reflect real land use planning. The City respectfully requests SCAG identify the location and extent of where these additional 2,000 housing units for the 6th Cycle would be located. In years past, SCAG actually reviewed General Plan land use maps to ascertain a City's carrying capacity which does not appear to have been done for La Mirada.
 - The area's housing characteristics that are unique in the City, such as student housing at Biola University do not appear to have been considered in the formulation of the RHNA.
 - The majority of the City's neighborhoods would require major water and sewer upgrades to accommodate the new infill development that would total approximately 2,000 new units. How would this new infrastructure be financed in such a relatively short period of time (assuming a six year time frame for implementation). The existing infrastructure is unable to support the water and wastewater requirements of the existing and previous RHNA.
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Should you have any questions regarding this appeal please feel free to contact me via email at: gbautista@cityoflamirada.org.

Thank you,

CITY OF LA MIRADA



Gabriel Bautista
Community Development Director