



DEPARTMENT of COMMUNITY DEVELOPMENT

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Via E-mail to housing@scag.ca.gov

Re: Comments on RHNA Reform

This letter is to comment on SCAG's methodology of assigning the RHNA with the hopes that there will be a drastic change that will result in a more realistic assignment of housing units in the future.

Gardena is a city of 5.9 square miles. The City is nearly completely built-out; with the vast majority of vacant property that does exist, being in commercially or industrially zoned land.

According to SCAG's RHNA data, Gardena had 20,817 households in 2016, 21,333 households in 2020 and a projection of 23,695 households in 2045 for a total household growth of 2,362 units in 25 years. Nevertheless, Gardena's RHNA allocation was an astounding 5,735 units broken down as follows: very low – 1,485; low – 761; moderate – 894; above moderate – 2,595. In other words, in a fully developed city, SCAG's methodology provided for an almost 27 percent increase in housing units in an eight year period. Future methodologies need to be consistent with SCAG's projected growth to have any credibility.

Gardena's RHNA was evidently based in part on the fact that in 2045, 98.7% of the City is expected to be in an HQT. However, it seems absurd to base an eight-year housing allocation on transportation projects that are based on 2045 projections. If this remains as part of the methodology, the time frames need to at least be coextensive, this was an error that resulted in an increase of allocation of units.

One of the goals of RHNA is to create an improved jobs/housing balance. However, the RHNA assigned to Gardena actually destroys the very balance that is supposed to be created. The only way in which to accommodate the City's RHNA allocation is to place high-density housing overlays over 195 acres of the City's commercial and industrial areas, which is more than 10 percent of such available land. Eliminating commercial and industrial uses reduces the jobs in the City, which in turn contradicts the overall goal of placing housing units near jobs.

Regards,

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Director of Community Development