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April 10, 2024

The Honorable Juan Carrillo
Chair
Assembly Committee on Local Government
1021 O Street, Suite 4320
Sacramento, CA 95814

Re: SUPPORT – AB 2485 (Carrillo) – Increasing Transparency and Accuracy of the Regional Housing Needs Assessment Determination

Dear Chair Carrillo:

On behalf of the City of Lomita, I am pleased to write in support of Assembly Bill (AB) 2485, which seeks to ensure an accurate and transparent Regional Housing Needs Assessment (RHNA) determination.

The RHNA is a state-mandated, local program in which California communities plan for housing to welcome all our current and future residents resulting from population, employment and housing growth. At the beginning of this process, the Department of Housing and Community Development (HCD) provides a RHNA determination to each Council of Governments (COG) region in California. The COGs receive the RHNA determination from HCD and develop a methodology to distribute the need to individual cities and counties, that must then plan for their share of the regional need by updating the Housing Elements of their General Plans.

Given the importance of the RHNA program to alleviating the state's housing crisis, accompanied by the sheer magnitude of needed housing compared to what has been built in the past, there is severe risk to the credibility of the process if it is insufficiently transparent, credible, and robust. AB 2485 would mitigate such risks by improving the development of the RHNA determination by ensuring its accuracy and transparency in two pivotal ways. First, AB 2485 would establish procedures for HCD to publicize its data sources, analyses, and methodology before finalizing a region's regional determination. Second, AB 2485 requires HCD to establish and convene a panel of experts to advise the department on its assumptions, data, and analyses before making its final determination on a region.

Lomita's 6th Cycle Housing Element received certification by the Department of Housing and Community Development in December 2021. We understand the housing element review process to be a partnership in accomplishing our shared goal to provide for and facilitate much needed construction of new housing, and to do so in a way that recognizes the unique

characteristics of the communities that make up our state. It is an opportunity for communities to think critically about statewide goals and determine the best method to accomplish those goals within our community. Unfortunately, throughout the process of review during this cycle, it was apparent that this partnership was instead viewed by HCD as an opportunity to dictate to each community what its future would be and to do so under duress and threat of significant consequence.

As an example, HCD required the city to commit to rezoning for additional density even though sufficient capacity had already been identified through the adequate sites analysis. The city's draft sixth cycle housing element identified existing and rezone capacity to accommodate the RHNA (829 units) plus a 24% buffer (199 units). The rezone program committed to a maximum allowed density of 30 dwelling units per acre – a 50% increase over existing densities - but was amended, after negotiating to reduce HCD's initial request for 50-80 dwelling units per acre, to allow 45-65 dwelling units per acre for an area along Lomita Boulevard. While it was the city's intention to consider increased density through a future specific plan process, there was undue pressure to prematurely commit to densities nearly double those discussed with our community as part of our public outreach as a requisite to obtain HCD certification. This request was well beyond the intent of the RHNA, especially considering the criticism of the RHNA process and concerns with the high allocation to the SCAG region (1,344,740 units) and Lomita's allocation – which increased from 47 units during the fifth cycle to 829 units in the sixth cycle.

There also appeared to be requirements and requests from HCD that reflected a distinct lack of understanding of local conditions within our community or a generalized effort to exert certain broad policies regardless of those conditions. One such example related to HCD's mandate that the city pursue place-based strategies to target housing choice vouchers in higher opportunity and higher income areas. HCD was informed numerous times that the Section 8 Housing Choice Voucher Program is administered entirely by the Los Angeles County Development Authority not under the control of the city but insisted that the city accept this requirement since HCD indicated it would withhold certification without the amendment. While the city accepted this under the looming threat of accelerated deadlines, it does not change the fact that Lomita has no control over the program.

HCD's continual push to reduce parking and other development standards is not appropriate for all neighborhoods as not all streets are fit for safe on-street parking or served by sufficient transit. Additionally, Lomita maintains a significant elderly population who struggle with accessibility as well as those who are handicapped – needs that seem to have been disregarded by the state. Large neighborhoods in Lomita are severely impacted in regard to parking because of developments constructed with insufficient parking prior to the city's incorporation. Let us not add to the burden those residents face.

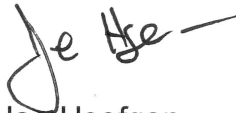
Similarly, HCD's attempt to prioritize residential uses over commercial uses does not allow for a healthy balance of land uses; increased population demands an increase in volume of services. Again, in this regard, HCD appeared throughout the review process to dictate its own vision rather than ensure the community's vision would accomplish our shared goals. HCD needs to recognize our cities have very diverse development patterns and land uses even between neighboring cities.

Lomita and other communities throughout California are at the forefront of the conversation with our residents about how to best meet the needs of a growing community. State-mandated growth imposed by HCD under threat of litigation ignores the unique characteristics of each community and forces a one-size-fits-all model onto local neighborhoods.

If a local Housing Element is based on an inaccurate RHNA determination, that could directly translate to housing units that are unaccounted for and thus remain unbuilt. This is made even more critical given that RHNA accounts for future growth as well as current need. In a March 2022 letter to the Legislature, the California State Auditor found that two of the three COG regions it studied had received underassessed housing needs. Therefore, it is imperative that the determinations provided to each region, and the housing allocation provided to each jurisdiction, be as accurate as possible, while ensuring that the communities using these numbers are confident in that accuracy.

Because of the City of Lomita's commitment to the RHNA policy goals of AB 2485, we are pleased to support this critical bill. We look forward to working with you and your staff on ensuring its successful passage. If we can be of any assistance, please contact Lina Hernandez, Senior Management Analyst at lina.hernandez@lomitacity.com or Brianna Rindge, Community and Economic Development Director at b.rindge@lomitacity.com.

Sincerely,



Joe Hoefgen
Interim City Manager

- c. Lomita Mayor and City Council
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