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CITY OF LOMITA

January 17, 2023

The Honorable Ben Allen
California State Senate
State Capitol Building, Room 4076
Sacramento, CA 95814

The Honorable Al Muratsuchi
California State Assembly
State Capitol, Room 2148
Sacramento, CA 95814

RE: Certification of the City of Lomita 6th Cycle Housing Element by Dept. of Housing and Community Development

Dear Senator Allen and Assembly Member Muratsuchi,

The City of Lomita writes to express our appreciation of your continued recognition of the importance of the voice of our communities as we collectively rise to the challenges facing our state. We also write to call to your attention the difficulties encountered to secure certification from the Department of Housing and Community Development (HCD) for the city's sixth cycle housing element. We understand and appreciate the gravity of the challenges that our communities and our residents face simply trying to afford to live comfortably and we have demonstrated our commitment to confronting those challenges head on. But, through the certification process, we cannot help but be left with the impression that, in the view of HCD and indeed that of many of your colleagues in the legislature, the solution to the statewide housing challenge lies in simply overriding and disregarding the voice of those who live and work in our communities. You both have demonstrated your continued recognition of the importance of that voice, and we thank you for you it.

Housing affordability and homelessness are among the most critical issues facing California cities and our residents, and 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.

Surely, we all share a collective responsibility to ensure safe and affordable living conditions for those struggling in our communities, and undoubtedly you will hear much during the coming legislative sessions about the impediments to housing development and construction erected by local communities and the need for the erosion of local processes and standards to allow for increased production of housing. We urge you to also recognize our shared responsibility to ensure that, as we are hyper-focused on the production of those housing units, we do not lose focus on our responsibility to ensure our communities continue to be as strong, vibrant, safe, and functional as we can make them. Affordable housing for every person in our communities is a worthy endeavor for which to strive, but quality affordable housing is the true goal we believe we all share. To simply require the production of more housing to the detriment of the quality of the life for those for whom the housing has been built is short sighted indeed.

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. Rather than assisting us in engaging in productive conversations with our communities, state-imposed requirements instead force our communities to be something they neither envisioned nor desire and make the role of local elected official in accomplishing our shared goals even more difficult. We seem to have fallen into the trap of seeing our neighbors as the problem and forcing them to accept change rather than recognizing they are in integral part of building a strong and unified community. Rather than recognize the strength of the voices working to find solutions, we disregard their input in favor of a statewide vision.

Public participation in Lomita's housing element process revealed widespread concern over how Lomita's existing challenges will be further exacerbated by the state's requirements in the housing element. For example, the city has existing traffic problems, which our Public Works Department is attempting to work through, and the existing population expresses a strong need for a grocery store within the city, both issues requiring significant resources from the city. All the while, the state has not provided significant funding or resources for cities to fund the required housing element programs. Shall Lomita direct its limited funding toward meeting these existing needs or toward statewide requirements that further exacerbate our existing problems?

Cities like ours are well positioned to engage our residents about new development and construction and to address their concerns appropriately. In fact, in Lomita – only 1.9 square miles with more than 20,000 residents – without any of the amendments required by HCD as part of the revised housing element, currently there are more than 250 new units of housing under construction with hundreds more under consideration. This is housing that will serve to meet not just the demand of our existing community, but future residents and the broader community as a whole. Like many cities throughout the state, Lomita has been working hard to accommodate new housing even in the face of significant opposition from the community. HCD seems to believe most if not all cities are actively discouraging development, and that is simply untrue.

HCD's lack of understanding of local communities reminds us of how the state's finance department viewed redevelopment a decade ago. Those misconceptions based on generalizations led to the state receiving a fraction of the money expected and wiped out the biggest funding tool in the state for creating affordable housing. Ironically, the short-sighted view of the finance department is causing the very issue HCD is now trying to fix.

We understand the need to ensure all Californians have access to an affordable home and we also understand the need to ensure that the community surrounding their homes continues to meet their needs for generations to come. We appreciate you both for your continued support and partnership with our Lomita community to find positive and functional solutions to the challenges we're facing together. Of course, we also appreciate the hard work and dedication

of the teams at HCD as they continue to work toward our shared goals, and we encourage you to continue to ensure the voice of local communities like ours is recognized and valued throughout their efforts.

We trust you will continue to see us as an ally in your efforts at the state level as well, just as we see you as an ally here in Lomita. Your constituents are our residents, and we look forward to working closely with you as we go forward to build a strong and vibrant Lomita community for all.

Thank you again for your partnership in our community and for representing us well in Sacramento.

Sincerely,

A handwritten signature in cursive script, appearing to read "Barry Waite".

Barry Waite
Mayor
City of Lomita

- c. Members of the Lomita City Council
 - Paul McDougall, HCD
 - Shawn Danino, HCD
 - Jason Gonsalves, Gonsalves and Son
 - Jeff Kiernan, League of California Cities
 - Marcel Rodarte, California Contract Cities Association