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August 22, 2019

Southern California Association of Governments (SCAG)
Attention: RHNA Subcommittee
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

California Department of Housing and Community Development (HCD)
Attention: Director Ben Metcalf
2020 West El Camino Avenue
Sacramento, CA 95833

Re: 6th Cycle Proposed Regional Housing Needs Assessment (RHNA) Methodology and Redondo Beach Methodology Appendix Data

Dear Honorable Chair Huang and Honorable Members of the Regional Housing Needs Assessment Subcommittee and Director Metcalf:

The City of Redondo Beach appreciates the opportunity to provide formal written comments to the RHNA Subcommittee concerning the "Proposed RHNA Methodology" (inclusive of the jurisdictionally specific data) that was presented at the RHNA Subcommittee Meeting on July 22, 2019 and subsequently modified and posted on SCAG's website on August 2, 2019. Additionally, the City supports and appreciates the dedication and commitment of time and effort of SCAG's staff and each RHNA Subcommittee member in addressing this complicated and nuanced subject matter. As we have historically, Redondo Beach will continue to address housing in compliance with Housing Element law (Government Code Sections 65580-65598.8).

Please consider the comments in this letter as you evaluate the appropriate methodology to utilize in calculating the 6th Cycle RHNA allocations. This letter touches on existing housing need issues, recommendations regarding factors to be considered in the methodology, concerns with the accuracy of the local data fields within the appendices, and previous cycle concerns.

It is vital that the determined methodology incorporate factors that align with the region's Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS) and address the stated RHNA Objective to promote an improved intraregional relationship between jobs and

housing. As proposed, none of the options include factors that directly address the region's jobs to housing imbalance. The City's comments largely focus on including factors that recognize and incorporate land use principles, currently lacking in all of the proposed options, that will better align future housing locations with long term strategies and solutions that local governments, in coordination with SCAG, are seeking to implement through the RTP/SCS. Without the inclusion of factors that acknowledge and address local and regional planning issues (i.e. existing local density, zoning mix/patterns, and jobs to housing ratios), the existing land use patterns contributing to the region's negative commuting patterns will be perpetuated and probably furthered with this 6th cycle, rather than corrected.

ISSUES WITH INCORPORATING EXISTING HOUSING NEED
Rectify the Discrepancy of Proposed Separate and Additional Existing Housing Need with the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)
The City of Redondo Beach is concerned with SCAG's submittal of an existing housing needs number to the California Department of Housing and Community Development (HCD), incorporating a separate and additional existing housing need allocation on top of the existing demand and projected growth already included in the 2020 RTP/SCS. Historically, RHNA legislation included provisions to consider existing and projected need as part of the RHNA methodology, and in previous cycles the consideration of additional existing housing need was assumed to be included within the existing demand and projected growth that SCAG forecasts for the RTP/SCS, in consultation with local jurisdictions. It is important to note that SCAG's local input process for the recently completed 2020 RTP/SCS growth forecast was comprehensive and the most successful to date, with outreach to and participation from all 197 jurisdictions. This recent robust region-wide process most assuredly included both projected and existing housing needs. Any additional housing calculations above the housing units pursuant to that effort would seem to result in double counting.

Additionally, it would be contrary to responsible and fundamental land use planning principles if the RTP/SCS local input growth forecast is modified to a higher RHNA regional determination by HCD without revising the actual RTP/SCS, since the RTP/SCS was prepared to provide a vision for transportation investments throughout the region, utilizing many of the same housing factors and growth forecasts based on actual local growth rates and economic trends projected out 20 years. If the RTP/SCS forecasts don't include the additional existing housing need counts potentially issued to the region, SCAG and its member jurisdictions would be planning for housing without the transportation network and job centers to support it.

The City's assertions noted above have been discussed at multiple RHNA Subcommittee meetings, as well as in discussions that SCAG staff conducted with various housing experts. As noted in SCAG's May 6, 2019 RHNA Subcommittee Staff Report, Agenda Item 5, Page 9, "… existing need is exceptionally challenging to pin down using available data sources. The trouble lies in the fact that housing need is linked to a wide array of social and economic conditions, leading to extremely wide estimates…" with some experts stating that "adding up several measures which overlap would result in excessively high estimates or double counting."

Even with this concern of having a separate additional existing housing need count added to the 2020 RTP/SCS housing needs figure, the City is aware of the RHNA subcommittee's decision to approve the separate and additional existing housing need of 228,855 in addition to the 430,289 identified as the "Regional housing need due to growth over the 8.25-year RHNA projection period." The City asserts for the record that SCAG should instead rely upon the RTP/SCS growth forecast of no more than 429,926 housing units for the 6th cycle in their ongoing discussions with the HCD.

Consider Phasing the Obligations Resulting from Additional Existing Housing Need Over Three Housing Element Cycles

Although the City opposes the addition of an existing housing need allocation on top of the housing units forecasted through the 2020 RTP/SCS efforts for the reasons stated above, if it is ultimately determined to be added, the City does generally favor a methodology that allows for SCAG to separately apportion and locate those housing units more thoughtfully within the region. Within the following section entitled "Consider a Zoning Factor if Additional Existing Housing Need Allocations Are Included" are substantive reasons in support of keeping the existing needs allocation separate.

As it has been presented, this separate and additional existing housing need is a substantial number of housing units that is a result of decades of under-production, especially with respect to multiple-family housing construction and affordable housing. The City of Redondo Beach believes that attempting to rectify a shortfall that occurred over past decades in this single eight-year Housing Element planning period, in addition to the projected needs component, is infeasible and should instead be allocated over the next three Housing Element cycles.

RECOMMENDATIONS FOR ADDITIONAL FACTORS TO BE INCORPORATED
Consider a Zoning Factor If Additional Existing Housing Need Allocations Are Included

Redondo Beach has long embraced its responsibility to provide residential development at much higher densities than what the City was originally intended/designed to accommodate. Historically the City was predominately a single family suburban residential community with commercial corridors to support the service and retail needs of surrounding neighborhoods. This is evidenced in the lot size and land use patterns of the City's zoning map. In review of the City's zoning map there are numerous examples of lot sizes and lot patterns that appear identical; however, the zoning of these seemingly identical subdivisions is now a mix of R-1 (Single Family Residential) and R-2/R-3 (Multiple Family Residential).

Over prior decades Redondo Beach has converted/up-zoned a majority of its originally planned Single Family residential neighborhoods into Multiple Family zoned and developed neighborhoods. This is unique in our South Bay Cities Council of Governments (SBCCOG) subregion. Many of the surrounding jurisdictions within the SBCCOG subregion have taken a different approach, as evidenced by their current zoning maps that largely preserve much of their Single Family residential zones/neighborhoods, resulting in a much smaller percentage of their residentially zoned properties having Multiple Family designations and densities.

Below is a table which illustrates the City of Redondo Beach's balanced approach, via zoning, to the development of diverse housing types over recent decades. Redondo Beach's current mix of residentially zoned neighborhoods is 65% Multiple Family densities/zoning designations and only 35% Single Family residentially zoned densities.

Redondo Beach Mix of Residential Zoning: 65% Multi-family Density – 35% Single-family Density			
Zone	Density	Area (Acres)	Percent
R-1 (Single Family)	8 DU/AC	752.87	35%
R-1A (Small Lot Single Family Zoning with a Multiple Family Density)	16 DU/AC	121.69	6%
R-2 (Multiple Family)	15 DU/AC	472.00	22%
R-3, RMD, RH1-3, R-MHP (Multiple Family)	Up to 28 DU/AC	702.08	33%
MU-1-3, CR (Mixed Use)	Up to 35 DU/AC	101.50	5%
Total		2,150	100%

Below is a table with comparative percentages of Single Family zones versus Multiple Family zones/densities for Redondo Beach, Torrance, Hermosa Beach, Manhattan Beach, and El Segundo (South Bay Cities), which clearly demonstrates the City of Redondo Beach's responsible approach to meeting existing housing needs over recent decades.

| South Bay Cities % Mix of Residential Zones									
Redondo Beach		Torrance		Hermosa Beach		Manhattan Beach		El Segundo	
% SFR Zone	% MFR Zone	% SFR Zone	% MFR Zone	% SFR Zone	% MFR Zone	% SFR Zone	% MFR Zone	% SFR Zone	% MFR Zone
35%	65%	75%	25%	59%	41%	79%	21%	67%	33%

*SFR includes R-1
**MFR includes the R-1A zones, in addition to all Multiple Family and Mixed Use zones, where R-1A zones have small lots with densities comparable to Multiple Family zones.

South Bay Cities % Mix of Residential Zones
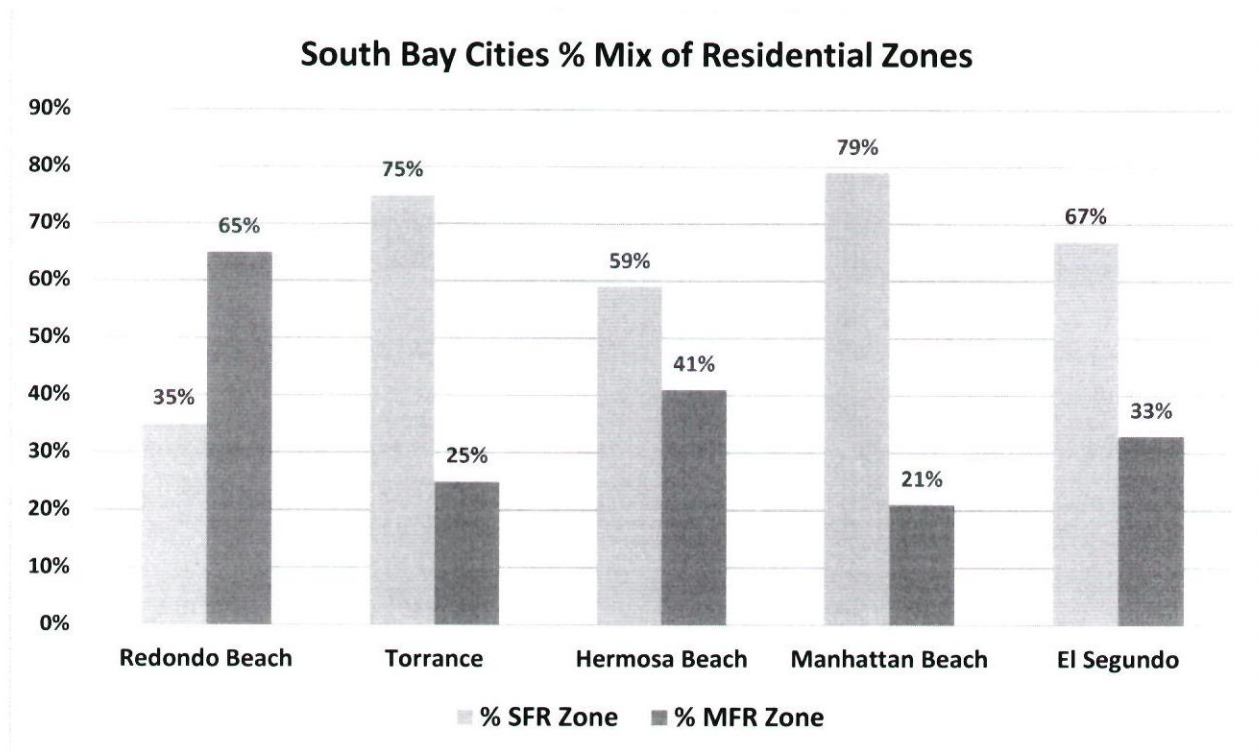
SCAG needs to incorporate basic land planning and zoning principles into the existing housing need methodology to avoid further impacting communities that have already taken responsible steps to provide housing through up-zoning. Allocating the existing need based on a simple pro rata formula without considering existing residential density would unfairly penalize communities such as Redondo Beach that have accommodated growth responsibly. Certainly, when compared to our surrounding neighbors, this is the case.

Recognize the Existing Density of Local Jurisdictions
Existing population density of local communities should be a consideration with distributing the RHNA. According to SCAG data, the City of Redondo Beach's population density is 17.1 persons per acre, which doubles the regional average of 8.3 persons per acre. Redondo Beach ranks 21st among SCAG's 197 member cities/counties. As a densely populated and built-out community, the City already has higher burdens on its infrastructure, including roads, open space and parks, schools, sewer and drainage facilities, and other services. Without considering a factor for existing density, the jurisdictions with higher population density could be disproportionately impacted. By incorporating of a "density cap" or "density credit" factor, potentially severe impacts and costs associated with overburdened infrastructure and resources could be avoided.

Population Density p/Acre
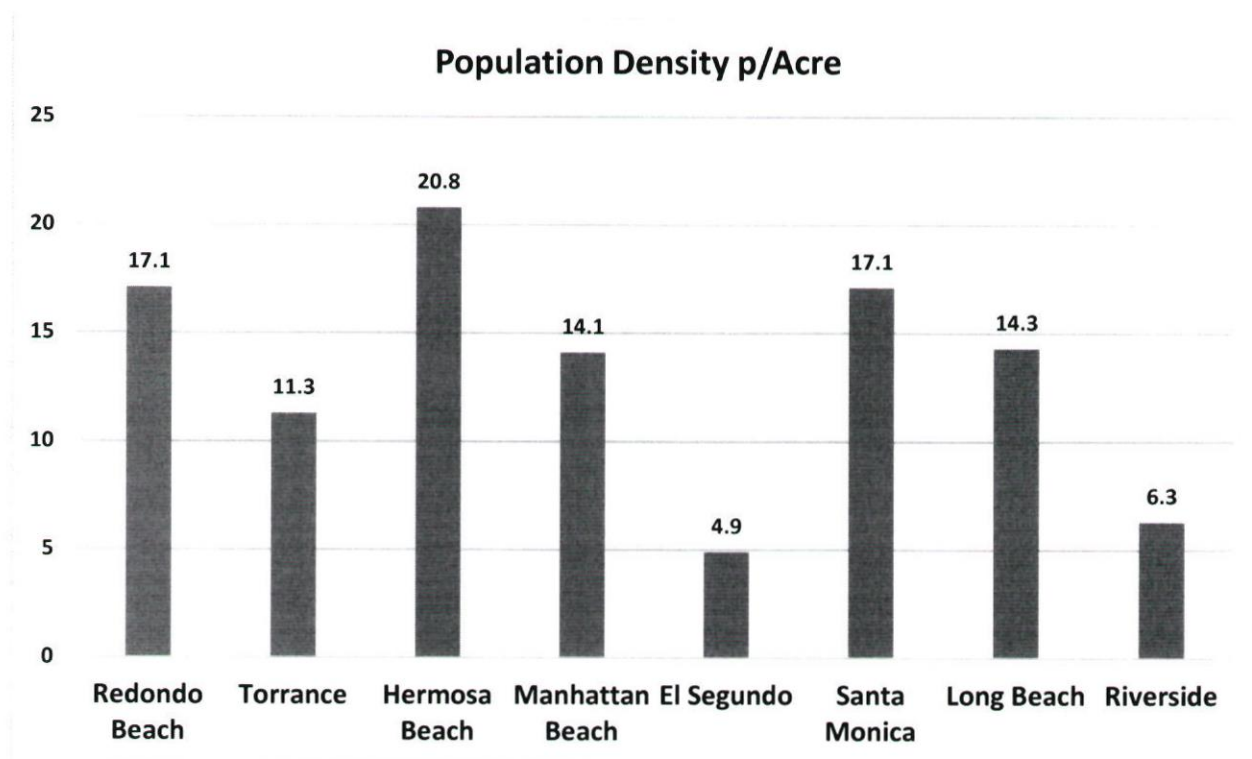
The City of Redondo Beach has an inventory of 156 assisted living units (total number of residents of 250), with up to an additional 360 units being considered by Beach Cities Health District, which would bring the total number to 516 assisted living units. Assisted living contributes to density in a community, since it is permanent housing for most who live in this type of facility. This permanent housing does have impacts and burdens on the City's infrastructure, as well. However, assisted living is not accounted for as housing related to RHNA. Adding a density factor could take into consideration these impacts of this permanent housing source.

Consider the Imbalance of Jobs-to-Household Ratio
In addition to the recent update to the City's Housing Element, the City also initiated an update to its General Plan Land Use Element in 2017. This effort has been supported with a 27-member General Plan Advisory Committee (GPAC) comprised of City residents that will conduct over 20 meetings before they render a recommendation to the City's Planning Commission later this year.

In support of the General Plan Update the City commissioned a comprehensive and robust "Demographic and Economic Trends Analysis". Included within this analysis was detailed data concerning the City's employment and labor trends. The analysis highlighted the comparison of resident employment and available jobs in Redondo Beach and quantified the mismatch between residents' professions and the opportunity to find employment within that profession within the City. The most significant commuter flow data documented that over 92% of the employed residents of the City of Redondo Beach commuted to their jobs which were outside

the City. The total outflow of Redondo Beach workers is 30,527 (source US Census LEHD, 2014; BAE, 2017). Redondo Beach also imports much of its retail and service sectors workforce from other jurisdictions; however, that number is significantly less than the net outflow of the Redondo Beach residents commuting for work. The following are the key data points from the City's recent economic analysis.

- The most significant commuter flow data documented that over 92% of the employed residents of the City of Redondo Beach commuted to their jobs which were outside the City.
- There is an existing demand for approximately 400,000 square feet of professional office space in Redondo Beach.
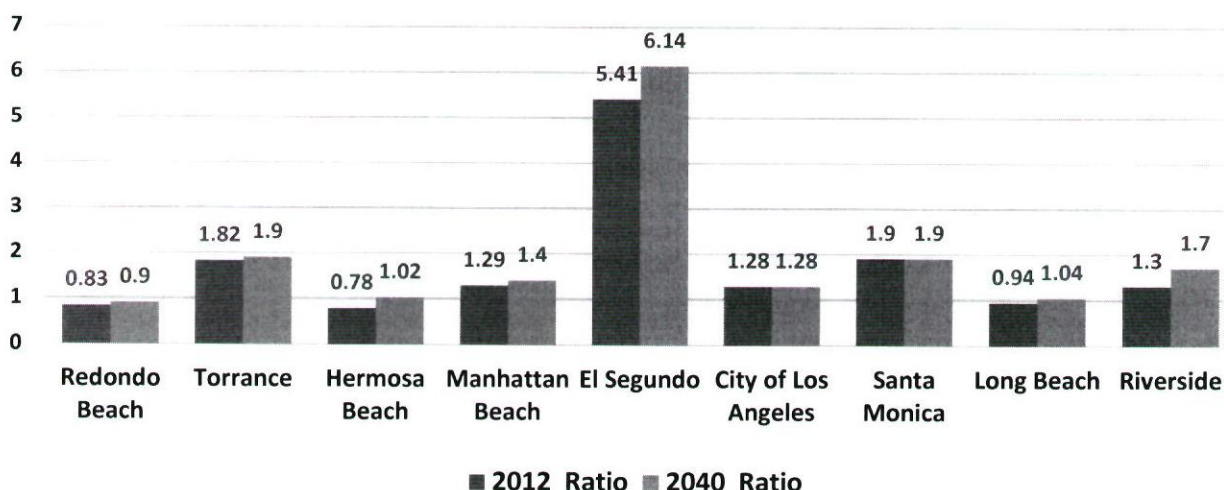
Additionally, according to the most recent SCAG Regional Transportation Plan (2016), Redondo Beach had a Jobs-to-Household Ratio of 0.83 in 2012. This indicates that there were only approximately 0.83 citywide jobs per Redondo Beach household, one of the lowest ratios in the South Bay with the exception of Hermosa Beach (see table below).

Jobs-to-Household Ratio by Jurisdiction, 2012 and 2040

Geography	2012 Emp	2012 HH	2012 Ratio	2040 Emp	2040 HH	2040 Ratio
Redondo Beach	24,000	29,000	0.83	29,800	33,000	0.9
Torrance	102,300	56,100	1.82	117,600	62,000	1.9
Hermosa Beach	7,400	9,500	0.78	10,000	9,800	1.02
Manhattan Beach	18,000	14,000	1.29	20,700	14,800	1.4
El Segundo	38,400	7,100	5.41	45,400	7,400	6.14
City of Los Angeles	1,696,400	1,325,500	1.28	2,169,100	1,690,300	1.28
Santa Monica	89,600	47,100	1.9	103,700	53,900	1.9
Long Beach	153,200	163,800	0.94	181,700	175,500	1.04
Riverside	120,000	92,400	1.3	200,500	118,600	1.7

Sources: SCAG 2016 RTP; BAE, 2017

Jobs-to-Household Ratio by Jurisdiction, 2012 and 2040

Bar chart showing 2012 Ratio and 2040 Ratio values: Redondo Beach 0.83, 0.9; Torrance 1.82, 1.9; Hermosa Beach 0.78, 1.02; Manhattan Beach 1.29, 1.4; El Segundo 5.41, 6.14; City of Los Angeles 1.28, 1.28; Santa Monica 1.9, 1.9; Long Beach 0.94, 1.04; Riverside 1.3, 1.7.

■ 2012 Ratio   ■ 2040 Ratio

According to SCAG forecasts, Redondo Beach's Jobs-to-Household Ratio is expected to only rise to 0.90 by 2040. In cities like Redondo Beach with a low ratio of jobs to housing units, local residents have fewer opportunities to work close to home, and more will commute outside the city limits to work elsewhere.

The State regulations regarding RHNA actually require that each member jurisdiction's existing and projected jobs and housing relationship is taken into consideration when developing the RHNA allocation. Jobs-to-Household Ratios should also be considered where adding housing in a higher density city with a lower than average Jobs-to-Household Ratio would make the city's Jobs-to-Household Ratio even worse and would further reduce the developable areas for job producing uses. The data clearly demonstrates that Redondo Beach, in order to reduce overall Vehicles Miles Traveled (VMT) consistent with SCAG's pending 2020 RTP/SCS, needs to develop more land uses in support of local professional jobs 2016-2040 that are consistent with the skills of the City's resident and future populations.

ACCURACY OF DATA FIELDS USED
Correct the RHNA Methodology Technical Appendix – Population and High-Quality Transit Area (HQTA)
For the reasons stated previously in this correspondence, the City does not support a blanket allocation of existing housing need based only upon the jurisdiction's share of the region's population. It unfairly burdens jurisdictions that have already responsibly worked to accommodate existing housing need through zoning and other planning mechanisms, as is the case for the City of Redondo Beach.

The City of Redondo Beach would support the inclusion of an existing housing need factor that links the location of housing with the location of regional transportation networks, as this factor is consistent with the recommended development patterns within the 2020 RTP/SCS. With that said, the City of Redondo Beach evaluated the High-Quality Transit Areas "Pilot Project" maps

per SCAG's 2016-2040 RTP/SCS and, although there is a portion of the City within the area that actually reflects the built Green Line facility, the inclusion of substantially more HQTA acreage and population that will not be realized in the 6th Cycle is not appropriate at this time. The columns in the RHNA Methodology Technical Appendix – Population and HQTA table have assessed the City of Redondo Beach with 662 acres and a population of 7,037 pursuant to the "Draft 2016 HQTA." The City of Redondo Beach asserts that because the location of future additional rail facilities that would be located within an HQTA are not finalized and are not expected to be developed during the 6th Cycle (and most likely well beyond 2029), the City requests that this table be revised accordingly to only include the area currently in proximity to the current Green Line station at Marine Avenue on the northern boundary of the City of Redondo Beach.

Furthermore, proximity to rail facilities should be limited to rail stations – a linear buffer along the rail line to generate HQTA population is inappropriate if there is no high-quality transit to link a community to a station within reasonable commute distance. Unlike bus routes, which have frequent stops, physical proximity to the rail line with no access to a station does not depict access to transit.

Correct the RHNA Methodology Technical Appendix – Residential Building Permits Issued
The Residential Building Permits Issued factor appears arbitrary and grossly inaccurate. The City of Redondo Beach requests that SCAG clearly explain how the ratio for the expected number of permits per population for the region and each jurisdiction was determined. The methodology for calculating the expected number of permits requires additional explanation to confirm the nexus between this factor and existing housing need.

Moreover, the accuracy of the Residential Building Permits Issued data is inconsistent with figures for housing that are reported to the HCD as required by State law. Below are just a few examples of the significant disparity between the residential permits as reported to HCD with the numbers of permits for the same period reported in this appendix. As is clearly illustrated the permits issued included in SCAG's Residential Building Permits Issued data are very different than the figures provided to HCD. Although the reporting period is certainly different for each of the data sets, 6 years for HCD data and 13 years for SCAG's data, and the residential building permits data in SCAG's appendix does not reflect demolitions, the discrepancies are still too significant to ignore and require verification.

Jurisdiction	Housing Units Report to HCD (2013-2018)	Residential Building Permits Issued – SCAG Appendix (2006-2018)
Hermosa Beach	11	557
Manhattan Beach	323	1,144
El Segundo	45	257
Torrance	119	1,048
Redondo Beach	285	1,450

The City of Redondo Beach requests that SCAG better support the "expected number of permits per population" with additional information, and, more importantly, correct the errors in the Residential Building Permits Issued data. The City highly recommends that any residential building permit data set be cross checked with data submitted to HCD.

Correct the RHNA Methodology Technical Appendix – Household Income Distribution – Social Equity Adjustments

As the City of Redondo Beach has recently completed a Midterm Update to its Housing Element (2017), data concerning household income distributions within Redondo Beach was updated. In review of the City's recent household income data against the information in SCAG's table for this factor, some corrections to SCAG's table are warranted.

SCAG's Household Income Distribution data tables reflect a lower number of households and, in turn, percentages of Very Low and Low Income households in Redondo Beach than the data within the City's 2017 Midterm Housing Element Update that had been provided to HCD. SCAG's estimates for these income categories is a combined 22 percent of the households in Redondo Beach. The City's Housing Element estimates 26 percent for the same income categories.

The numbers of households and the percentage of the various income categories directly impacts the calculations proposed in all three methodologies for determining the "Social Equity Adjustments." Therefore, the City of Redondo Beach requests SCAG revise their proposed numbers of households and percentages to be consistent with the data within the City's 2017 Midterm Housing Element Update and, in turn, revise SCAG's Social Equity Adjustments factors accordingly.

The following revisions are proposed to the SCAG's Household Income Distribution data points for the City of Redondo Beach:

Redondo Beach's Very Low Income: 4,646/16.7% (revise from 3,742/13.4%)
Redondo Beach's Low Income: 2,587/9.3% (revise from 2,381/8.6%))
Redondo Beach's Moderate Income: 3,311/11.9% (revise from 3,184/11.4%)
Redondo Beach's Above Moderate Income: 17,276/62.1% (revise from 18,514/66.5%)

The City of Redondo Beach requests that SCAG correct the tables entitled "Social Equity Adjustments Existing/110%/150%" and "Existing Need Social Equity Adjustment" to reflect the corrected data provided above.

Correct the Significant Inconsistencies in the RHNA Methodology Technical Appendices – Residential Building Permits Issued vs Projected Household Growth – Population Growth

In addition to carefully reviewing the growth rate and residential building permits issued appendix tables for Redondo Beach data set, the City reviewed other jurisdictions in our SBCCOG subregion. The table below exposes some significant discrepancies that must be resolved/verified. Although the lengths of time are different in the table below (13 years for

residential building permits versus 8 years for household growth), the variances are a significant concern. By prorating the 13 years of building permits into an 8-year period, substantial under-estimation appears to have occurred. Redondo Beach's local input on growth projection appears to be the most in-line with its past trends among its neighbors.

Furthermore, crosschecking building permit data reported to HCD as part of the Housing Element Annual Progress Reports (APR) reveals that Hermosa Beach reported only 11 units permitted between 2013 and 2018. The discrepancies between SCAG's data for residential permits issued versus reported residential units to HCD are too significant to be credible without verification.

By over-estimating Building Permits Issued (and therefore a lower correction for under-permitting) and under-estimating Projected Growth (and therefore also a lower share of future RHNA), jurisdictions could erroneously receive a double-advantage that continues the trend of unfair RHNA distribution.

Significant Inconsistencies in Methodology Appendices				
Jurisdiction	Residential Building Permits Issued (2006-2018)	Projected Household Growth (2021-2029)	Projected Household Growth Based on Past Building Permit Trend (2021-2029)	% Difference in Projected Growth
El Segundo	257	85	158	-86%
Hermosa Beach	557	106	342	-223%
Manhattan Beach	1,144	31	704	-2170%
Rancho Palos Verdes	234	23	144	-526%
Torrance	1048	450	645	-43%
Redondo Beach	1,450 (1,460 Actual-reported to SCAG)	534	679	-27%

CONCERNS WITH PREVIOUS CYCLE DATA
Address Errors in Data Points
The City of Redondo Beach was issued a 5th Cycle RHNA allocation that was grossly out of alignment with its neighbors within the SBCCOG subregion. There appear to have been many factors, some known and understood and others not, that led to the gross error of Redondo Beach's 5th cycle RHNA allocations. The City has significant concerns that the 6th Cycle will again repeat and potentially compound prior errors, especially those related to jurisdictionally-specific data. As an example, one data point in particular in the 5th Cycle calculations entitled

"Replacement Housing" erroneously assigned the City of Redondo Beach with approximately 10% of the replacement housing for the entirety of Los Angeles County, when in fact the replacement need for the City was zero (as is the case for the 6th Cycle RHNA). Additionally, growth rates 10 times the City's actual growth rates were utilized for the 5th Cycle, and similarly incorrect growth rates are contemplated with the 6th Cycle.

Below are the current 5th Cycle RHNA allocations of Redondo Beach and neighboring jurisdictions, to illustrate the significant misallocations noted above.

5th Cycle RHNA Allocations:
- Redondo Beach (Population: 67,412):   1,397
- Hermosa Beach (Population: 19,465):   2
- Manhattan Beach (Population: 35,532):   38
- El Segundo (Population: 16,719):   69
- Torrance (Population: 145,182):   1,450

Per these calculations, Redondo Beach's 5th Cycle RHNA allocation of 1,397 housing units is approximately 13 times larger than the combined RHNA allocations of neighboring beach cities that have a collective population of 71,716 compared to Redondo Beach's 67,412. As well, Redondo Beach's 5th Cycle RHNA allocation of 1,397 housing units is nearly the same of another neighboring jurisdiction that has a population more than twice that of Redondo Beach and with a geographic area over 3 times the size of Redondo Beach. Again, the City wants to ensure that the 6th Cycle is equitable, transparent, and reflective of local planning factors that are a fair representation of the needs.

CONCLUSIONS ON OPTIONS FOR METHODOLOGY FOR 6TH CYCLE

None of the proposed Options for Methodology for the 6th Cycle RHNA allocation incorporate factors to address the stated RHNA Objective to address the region's jobs/household imbalance. Additionally, there are no factors included that recognize and incorporate land use principles that will better align future housing locations with long term strategies and solutions that local governments, in coordination with SCAG, are seeking to implement through the RTP/SCS. Without the inclusion of factors that acknowledge and address local and regional planning issues (i.e. existing local density, local zoning mix/patterns, and jobs to housing ratios), the existing land use patterns contributing to the region's current commuting patterns will continue to yield negative impacts, including increased regional VMT and increased greenhouse gas emissions. Therefore, the City of Redondo Beach recommends that the SCAG RHNA Subcommittee consider a different option that incorporates the following local factors:

Local Zoning Factor
This particular additional factor is necessary in determining a more equitable allocation of existing need housing units. A jurisdiction's zoning designations and regulations serve as its true litmus of how responsible it has behaved toward the provision of diverse housing types. By considering a factor that measures a jurisdiction's percentage mix of residential zoning

densities, a factor can be developed that credits those jurisdictions that have proactively zoned for more housing versus those jurisdictions that have zoned more conservatively.

Density Factor
Some consideration for a jurisdiction's existing population density should be factored to avoid overburdening limited local infrastructure, services, and resources.

Jobs-to-Household Ratio Factor
As required by State law, a jobs-to-household ratio factor must be included in whatever methodology is approved. To distribute hundreds of thousands of households across the SCAG region without considering this critical and basic land use principle could result in the continued evolution of the region's negative commuting patterns, which is significantly inconsistent with SCAG's 2020 RTP/SCS.

Additionally, of the local factors that are included within Option 1 and Option 3 the City has serious concerns with the inaccuracies and internal conflicts in the data sets within the appendices that support each of the formulas for those methodologies. Whatever the local factors are to be considered, they must be accurate. Some verification process needs to be confirmed to correct the numerous significant errors that exist in the appendix tables.

Finally, the additional existing housing need is a substantial number of housing units that is a result of decades of under-production, especially with respect to multiple-family housing construction and affordable housing. The City of Redondo Beach recommends that any separate calculation for existing housing need should be allocated over the next three Housing Element cycles.

At their August 6, 2019 and August 20, 2019 regularly scheduled meetings, the Redondo Beach City Council held discussions and have authorized this comment letter regarding the 6th Cycle RHNA allocation methodology options. If you have any questions regarding this comment letter, please contact the Redondo Beach Community Development Director Brandy Forbes at (310) 318-0637 x2200 or brandy.forbes@redondo.org.

Sincerely,

Mayor William Brand

Cc: Redondo Beach City Council
        Joe Hoefgen, Redondo Beach City Manager
        Brandy Forbes, Redondo Beach Community Development Director