



2018-2019

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March 27, 2019

The Honorable Scott Wiener
State Senator
State Capitol Building, Room 5100
Sacramento, CA 95814

**RE: SB 50 (Wiener) Planning and Zoning. Housing Development Incentives
Oppose Unless Amended (as amended 3/11/19)**

Dear Senator Wiener:

The League of California Cities must respectfully oppose SB 50 unless the measure is amended to address our key concerns. SB 50 would allow developers of certain types of housing projects to override locally developed and adopted height limitations, housing densities, parking requirements, and limit design review standards.

We agree with the fundamental problem—there aren't enough homes being built in California. The League of California Cities remains committed to working with you, the Legislature, and the Governor on finding ways to help spur much needed housing construction statewide without upending longstanding community driven planning processes and stakeholder involvement.

Unfortunately, SB 50 as presently drafted lacks the flexibility needed to meet the State's housing goals while also acknowledging community input and engagement. Specifically, the League has significant concerns with the following:

- **SB 50 would greatly undermine locally adopted General Plans, Housing Elements** (which are certified by the Department of Housing and Community Development), and Sustainable Community Strategies (SCS). By allowing developers to override state approved housing plans, SB 50 seriously calls to question the need for cities to develop these community based plans in the first place.
- **Housing developers and transit agencies would have the power to determine** housing densities, heights up to 55 feet, parking requirements, and design review standards for "transit-rich housing projects" within one-half mile of a major transit stop. For those "transit-rich housing projects" within one-quarter mile radius of a stop on a high-quality bus corridor, developers would be able to determine housing density, and parking requirements above .5 spots per unit.
- **What is the full scope of SB 50?** As presently drafted, it is very difficult to determine what constitutes a "jobs-rich area" since the Department of Housing and Community Development and the Office of Planning and Research are largely tasked with making that determination.
- **Greater density but no public transit?** SB 50 would require cities to allow greater density in communities that are high opportunity and jobs rich, but



lack access to public transit. This seems at odds with many state policies that encourage and incentivize more dense housing near transit so that individuals may become less dependent on automobiles.

- **SB 50 allows some communities to be exempt** if they develop their own plan that is consistent with the objectives of the bill. Why not all communities? Shouldn't all jurisdictions have the ability to have a community-led planning process that takes into account local needs and input as long as state objectives are still met?

For these reasons, the League of California Cities opposes SB 50 unless it is amended to address the above concerns. If you have any questions, please feel free to contact me at (916) 658-8264.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Rhine".

Jason Rhine
Assistant Legislative Director

cc. Members, Senate Committee on Housing
Alison Hughes, Consultant, Senate Committee on Housing
Ryan Eisberg, Consultant, Senate Republican Caucus



SOUTH BAY CITIES
COUNCIL OF GOVERNMENTS

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February 20, 2019

The Honorable Scott Wiener, Chair
Senate Housing Committee
State Capitol Building, Room 2209
Sacramento, CA 95814

**RE: SB 50 (Wiener): Planning and zoning: housing development: equitable communities incentive –
Notice of OPPOSITION**

Dear Senator Wiener:

On behalf of the South Bay Cities Council of Governments (SBCCOG) I am writing to express our opposition to SB 50 (Wiener). As a joint-powers authority of 16 cities and unincorporated areas in Los Angeles County, this bill significantly undermines local authority and control for our members.

Although the state housing crisis is real and must be addressed, it must be done in conjunction with the state's other critical goal of reducing greenhouse gas emissions. It is also important to note that a single state-wide strategy for producing "sustainable housing" will not work in every city or region. Enclosed in this letter is a White Paper written by the SBCCOG. This White Paper not only includes the reasons we cannot support SB 50, but also includes suggestions that we think would work better. This White Paper is written as a supplement to the original paper written in response to SB 827 (Weiner) during the previous legislative session, which is available online at: <http://southbaycities.org/news/resolving-housing-carbon-dilemma-state-policy-role-local-government>.

We encourage you to work with local governments and the League of California Cities to develop a dynamic policy that is adaptable to all regions of this diverse state.

Should you have any questions, please contact SBCCOG Executive Director, Jacki Bacharach, at (310) 371-7222.

Sincerely,

Britt Huff, SBCCOG Chair
Councilmember, City of Rolling Hills Estates

Enclosure (1)

CC: Members, Senate Housing Committee
South Bay Senators: Allen, Bradford, and Mitchell
Jeff Kiernan, League of California Cities Regional Public Affairs Manager (via email)

LOCAL GOVERNMENTS IN ACTION

Carson El Segundo Gardena Hawthorne Hermosa Beach Inglewood Lawndale Lomita
Manhattan Beach Palos Verdes Estates Rancho Palos Verdes Redondo Beach Rolling Hills
Rolling Hills Estates Torrance Los Angeles District #15 Los Angeles County

Resolving the Housing-Carbon Dilemma in State Policy: The Role of Local Government

White Paper -- Supplement February 2019

The South Bay Cities Council of Governments (SBCCOG) distributed its White Paper (December 2018) on policies to achieve zero emission housing in suburban cities. It was written in response to 2018's proposed housing legislation, SB 827. This supplement responds to its 2019 successor, SB 50.

The key issues remain:

- While the state has a housing crisis, it must be addressed in conjunction with another critical state goal, reducing GHG emissions
- A single strategy for producing "sustainable housing" will not fit every context.
- Transit oriented development in particular will not effectively limit GHG emissions generated by residents' mobility choices in suburban contexts.
- Local governments are best positioned to determine politically acceptable siting and density of new housing in order to minimize GHG emissions (criteria pollutants and congestion) while meeting housing development goals.
- Whether as redevelopment or infill, the State should support and provide financial assistance to a strategy anchored by zero emission multi-modal mobility.

Essentially, SB 50 lacks the complexity to produce housing that can and will also address the urgency of the climate crisis. Meeting the target of 3.5 million new homes by 2025 must be done in a way that minimizes the carbon emissions generated by the mobility choices of the new residents. That will require a number of supporting policies that will expand zero emission mobility and access options. The State should play the key role by setting targets for maximum allowable GHG emissions by residents of new housing. Specifying density adjacent to transit will neither produce enough housing nor minimize carbon outcomes.

Consider:

State bears some of the responsibility for housing shortages. SB 50 continues to assign responsibility for the housing shortage solely to cities which are characterized as NIMBYs with "outdated and highly restrictive zoning." It would be productive for the legislature to look critically at existing State policies as being equally responsible, and a good place to start when developing new legislation. Sacramento has for years promoted a single housing-sustainability strategy -- residential density adjacent to public transit. Local voters organizing in opposition are not mindless NIMBYs; they understand that increased density, whether adjacent to transit or job centers, will damage quality of life. Claims to the contrary are not believable from the perspective of experience on the ground. As an editorial on SB 50 in the local South Bay newspaper concluded: "Some other solution must be sought, because it accomplishes little to begin solving one serious problem while making other problems worse." (Thomas Elias, Daily Breeze, February 8, 2019) *Cities need the policy tools, technical assistance and the*

authority to determine the most politically feasible strategy for effectively developing zero emission, zero pollutant and zero congestion housing.

SB 50 continues to ignore the special needs of suburban cities

SB 50 draws lessons from examples of reforms “that help alleviate the crisis by encouraging infill housing near transit, job, and educational opportunities.” (More HOMES Act of 2019 Fact Sheet, 12/3/2018). However, the examples listed were from Oakland (TOD) and Los Angeles (Transit Oriented Communities program); both at the center of their respective metropolitan areas. This reinforces the concern that state housing policies work most effectively in the relatively few large urban places, while the majority suburban places are ignored. *In suburbs, zero emission mobility will be produced by building housing in a way that complements multi-modal electric vehicles, rather than transit service. The infrastructure, residential densities and the supporting policies are radically different between the two candidate strategies for building housing while minimizing greenhouse gas emissions*

The SBCCOG’s 16 year-long Research and Demonstration program, one of the most advanced in the state, created and tested components of a strategy for developing housing that will eventually lead to zero emission mobility by the residents. This is the “Sustainable Neighborhoods Strategy” – adding housing by redeveloping obsolete retail/commercial properties in densities compatible with the existing neighborhood. This strategy will produce “complete” neighborhoods with high walking mode shares complemented by short range, slow speed zero emission vehicles for the 70% of trips that today are shorter than 3 miles and 90% shorter than 10 miles. In other words, 90% of household trips can be zero emission with the right combination of housing development, commercial redevelopment, electric mobility and virtual presence.

SB 50 continues to oppose housing development outside of the already crowded metropolitan core despite the potential for more affordable units slightly further away.

This amounts to the State characterizing an actual opportunity as a problem while treating the actual problem as an opportunity.

The problem as opportunity: The coastal counties and cities are the main target of SB 50; yet those are the most difficult places to build affordable housing – on expensive land in congested areas where there are no vacant lots and where construction requires demolition. That is redevelopment, not infill as referred to SB 50. That distinction matters. The following quote from the legislative summary refers to “already developed areas” where what is important is whether there is vacant land (which can be infilled) or not (requiring redevelopment).

- “Encouraging new homes in already developed areas and areas of opportunity not only alleviates the housing crisis, but also supports the State’s climate change and equity goals.”

Most troubling, the redevelopment strategy may not work as assumed. New research was just published in Urban Affairs Review (“Upzoning Chicago: Impacts of a Zoning Reform on Property Values and Housing Construction,” Yonah Freemark, January, 2019) which found that upzoning (changing local land use regulations to allow for greater density, as would be required by SB 50) did not increase housing supply over

the 5 year study period (2013-2018); and housing prices rose on the parcels that were upzoned, so housing became less affordable, not more. In summary, the research found that in the short term (within 5 years) local level impacts of upzoning are higher property prices but no additional new housing construction. (<https://www.msn.com/en-us/money/realestate/does-upzoning-boost-the-housing-supply-and-lower-prices-maybe-not/ar-BBT05sL?ocid=spartandhp>)

In addition to expensive land and constrained development possibilities, built-out cities have carrying capacity issues (solid waste landfills that have reached capacity; old, limited capacity sewage systems requiring replacement before accommodating additional demand; limited open space and parkland).

The opportunity as problem: Developing some housing in the suburbs outside of the metropolitan core would produce more affordable homes that can be built as “zero-emission” and at a much faster pace. With a target of 3.5 million new homes before 2025, the rate of construction is very relevant. This approach is often characterized as adding to “sprawl,” but would be the opposite – fix what is considered sprawl by using infill housing and commercial development to create complete suburban neighborhoods.

SB 50 considers those locations undesirable because of the ‘access’ problem created by living outside the metropolitan core.

- Without intervention (represented by SB 50), much of the population increase can be expected to occur further from job centers, high-performing schools, and transit, constraining opportunity for future generations. More HOMES Act of 2019 Fact Sheet (12/3/2018)

It is much easier and cost-effective to solve the “access” problem created by infill development outside of the metropolitan core than it is to solve the affordability-problem from redevelopment of expensive land in already congested areas.

It is time to add a new approach to housing development policy while preserving local control. Success will require state and local governments to cooperate on means to meet the goal rather than the State mandating the means.

“The notion that increasing housing supply will magically fix our problems is one of those things that is simply too good to be true. Zoning liberalization is at best one part of the answer. America’s housing and urban crises are thorny problems that we can only come to grips with using a broad mix of strategies and solutions.” (Richard Florida, CITYLAB, January 30, 2019)

In other words, building housing in a 21st Century sustainability framework requires robust policy with a legislative package (not a single Bill) that coordinates housing construction with zero emission mobility, virtual access to key destinations, and supporting infrastructure. A simple density-transit approach with some parking concessions will neither produce enough new housing nor limit the carbon outcomes from whatever housing gets built.

ATTACHMENT

Mix of Strategies Suggested By Findings from SBCCOG's R & D Program:

Priority: In order to respond to both crises – housing and environment -- the State should set carbon emissions standards for new housing developments. RHNA sets targets for the volume of affordable housing that should be developed in each city, but the State is silent on the allowable GHG emissions from those developments. As mentioned above, the Sustainable Neighborhoods Strategy holds the promise of 90% of household trips being zero emission. The State should set the target; cities should adopt housing regulations that would meet both the housing volume and carbon emissions targets; developers should submit a carbon emissions component with their housing plans describing how the target will be met; and cities should review those plans as part of their project approval process.

Require Sustainable Land Use/Development

- Fund MPOs to inventory vacant land suitable for infill development in each jurisdiction, and to develop “complete neighborhood” models for cities with infill opportunities.
- Ensure State planning guidelines include policy and methods to guide infill development in order to create complete neighborhoods.
- Adopt policy tools to help cities redevelop retail strips to housing. This may require help with assembling parcels for example. Develop analytical tools for cities to identify the best redevelopment targets along commercial arterials. SCAG is currently conducting such an analysis for the SBCCOG with findings expected before May 1, 2019.
- Offer incentives to commercial developers for building to accommodate a high density of individual businesses; and for incorporating shared work spaces.
- Offer incentives to building owners and tenants for providing charging and parking for EVs, especially zero emission local use vehicles (LUVs).

Decentralize Destinations to Outside the Metropolitan Core

- Develop incentives to attract businesses planning expansion in the metropolitan core to decentralize to those sub-regions and cities with vacant land. Likewise, incentivize new business formation in those same places.
- Incentivize medical and educational institutions to advance telemedicine and distance education programs for distribution throughout the region, reducing the absolute need for physical access.
- Fund MPOs to develop regional telework programs. Offer incentives to employers with telework programs, especially those that, for example, provide work sites within 3 miles of home for 50% of its workforce at least 2 days per week.

Develop Infrastructure for Sustainability

- Ensure that every city has affordable access to fiber networks that deliver 1 to 10 gig/sec service. A combination of grants and low interest loans will help sub-regions throughout the state replicate the SBCCOG's fiber ring backbone network currently in development. The fiber ring is essential to the many work, medical and educational applications that make virtual presence a feasible complement to physical access adding the trip not taken to the transportation strategy.
- Revise the Caltrans Complete Streets Planning Guide to include "local travel networks" that provide the infrastructure for the safe use by the evolving market of short range, slow speed vehicles. Today that guide addresses only bike, pedestrians and bus transit.

Support Zero Emission Mobility Options

- Direct the California Air Resources Board to:
 - Develop a Clean Vehicle Rebate Program that provides robust incentives for apartment building owners and condominium HOAs to purchase neighborhood electric vehicles as a building amenity for sharing among residents; and for community-based organizations in Disadvantaged Communities with ride sharing and/or vehicle sharing programs.
 - Offer rebates of up to 30% off the purchase prices for all approved zero emission, slow speed, short range vehicles and devices for eligible consumers.
- Develop a program that will incentivize public transit agencies to develop or partner with micro-mobility services and other innovations for shared rides that approximate door-to-door, on-demand services.
- Require that new multi-unit housing construction include electric charging with parking for a high volume of short range, slow speed vehicles.

Send comments to ws@siembab.com,

South Bay Cities Council of Governments Research Director



American Planning Association
California Chapter

Making Great Communities Happen

March 25, 2019

Senator Scott Wiener
Room 2028
State Capitol
Sacramento, California 95814

SUBJECT: **SB 50 (Wiener) – Notice of Oppose unless Amended**
Housing Development Incentives and Requirements
In Senate Housing Committee – Tuesday, April 2nd

Dear Senator Wiener:

The American Planning Association, California Chapter must respectfully oppose SB 50 unless amended. SB 50 will create mandatory overrides of local zoning around transit as well as areas with high job but low housing rates. Although our organization is generally supportive of increasing housing development and planning for density near transit and promoting a healthy regional jobs-housing fit, APA is concerned about the mechanics of implementing SB 50 in its current form. APA appreciates meeting with you and your staff on this bill to discuss our perspective.

Without having more information on the points below, even as recently amended it is hard to know how effective SB 50 would be, where it would apply, and what local options for influencing development would remain. The responses to these comments will determine if APA can eventually support the bill.

- The definitions of “job-rich housing project” and “job-rich area” need to be defined in statute, rather than deferred to a determination by HCD in consultation with OPR, so that the areas subject to the “equitable communities incentive” that are not within a one-half mile radius of a major transit stop or a one-quarter mile radius of a stop can be understood in advance. (S. 65918.50 (e) - (f).)
- The bill appears to apply to all zones where residential uses are permitted, even where such uses are only considered conditionally permitted uses. The bill should not require communities to adopt residential projects in commercial zones where residential in only a permitted use with a CUP, for example, to avoid incompatible uses. (S. 65918.52(b).)
- Projects eligible for an equitable communities incentive should be required to build the affordable units in exchange for the incentive benefits rather than permit project to qualify through payment of an in-lieu fee or other alternative that is not guaranteed to result in affordable housing production.

C/O STEFAN/GEORGE ASSOCIATES

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(S. 65918.52 (c).)

- The new unit threshold of 10 or fewer units for imposing affordability contribution requirements for eligible projects will be below existing density bonus requirements, which apply to projects with five or more units. To avoid confusion about whether a project can receive incentives and concessions and waivers under the density bonus law after qualifying for an equitable communities incentive, the two laws should be harmonized. Moreover, because an equitable communities incentive would increase development potential beyond what is allowed under density bonus law, the affordability requirements to qualify for an equitable communities incentive should be greater than what is needed to qualify for a density bonus. (S. 65918.52(B) and 65918.53.)
- The bill still requires the same incentives be given developers in every jurisdiction of the state. It should allow jurisdictions that agree to approve the eligible projects by right to gradually increase heights/FAR/densities up to the greater of four times greater than surrounding neighborhoods or the maximum specified in the bill. As noted above, however, the increases in development potential allowed for equitable communities incentive projects must be provided in exchange for much higher affordability percentages in the project than are currently required in the bill or in density bonus law. This approach is more similar to LA's JJJ concept and would still substantially increase the development potential in these targeted areas. (S. 65918.52 (B) and 65918.53.)
- Under GC S. 65915 subdivision (e), density bonus law requires local jurisdictions to waive any development standards that "physically preclude" development at the permitted density. If an applicant receives a "waiver from density" as an equitable communities incentive and continues to qualify for density bonus waivers, as written this could potentially allow a project to waive any other development standards. ((S. 65918.53(a)(1) and (b)(1).) This must be fixed by defining what, if any, waivers must be granted to an equitable communities incentive project.
- Rather than inventing a new "sensitive communities" definition and process, using the SB 1000 definition and process would allow communities to understand where this section would apply and to use the recently adopted community plans already completed. (S. 65918.50 (j) and 65918.55.)

If you have any questions, please contact our lobbyist, Sande George, with Stefan/George Associates, sgeorge@stefangeorge.com, 916-443-5301.

Sincerely,



Eric S. Phillips
Vice President, Policy and Legislation - APA California

cc: Governor's Office
Senate Housing Committee
OPR
Republican Caucus



City of Manhattan Beach

March 19, 2019

CITY COUNCIL

Steve Napolitano
Mayor

Nancy Hersman
Mayor Pro Tem

Richard Montgomery
Councilmember

David J. Lesser
Councilmember

Amy Thomas Howorth
Councilmember

CITY TREASURER

Tim Lilligren, C.P.A.
Treasurer

The Honorable Scott Wiener
California State Senate
State Capitol Building, Room 4066
Sacramento, CA 95814

RE: SB 50 (Wiener)
Notice of Opposition (as introduced 12/03/18)

Dear Senator Wiener:

The City of Manhattan Beach City Council **Strongly Opposes Senate Bill (SB) 50**, related to exempting certain housing projects from locally developed and adopted height limitations, densities, and parking requirements.

Specifically, SB 50 undermines locally adopted general plans, housing elements (which are certified by the Department of Housing and Community Development), and Sustainable Community Strategies (SCS). SB 50 allows private for-profit housing developers and transit agencies to determine housing densities, and parking requirements within one-half mile or one-quarter mile of a major transit stop. Under existing law, cities are already required to zone for densities at levels necessary to meet their entire Regional Housing Needs Allocation (RHNA).

The City of Manhattan Beach currently has numerous adopted ordinances related to building height limitations, densities, parking requirements, and design review standards. SB 50 would preempt the ordinances the Manhattan Beach City Council has adopted and leave the City at risk of losing all protections necessary to preserve the quality of life residents are favorable to. Exempting large-scale developments from general plans, housing elements, and zoning ordinances goes against the principles of local democracy and public engagement.

While the authors of SB 50 state that the purpose of this legislation is to address the housing crisis in California through infill housing, in coastal communities such as Manhattan Beach, where density is high and empty lots are few, the result is that SB 50 would encourage redevelopment, not infill.

State Senator Scott Wiener
California State Senate
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Additionally, SB 50 would strip control away from the City of Manhattan Beach by overreaching into the current local controls within the City's Municipal Code.

For these reasons, City of Manhattan Beach Council Strongly Opposes SB 50.

Thank you for your time on this matter.

Sincerely,

Steve Napolitano
Mayor
City of Manhattan Beach

cc: Honorable State Senator Ben Allen
Honorable State Assemblyman Al Muratsuchi
Senate Standing Committee on Housing
Senate Governance and Finance Committee
Jeff Kiernan, League of California Cities Regional Public Affairs Manager
League of California Cities, cityletters@cacities.org

February 13, 2019

Honorable Scott Wiener
State of California, District 11
State Capitol, Room 4066
Sacramento, CA 95814-4900

RE: CITY OF REDONDO BEACH **OPPOSES** SB 50

Dear Senator Wiener:

On February 12, 2019, during our regularly scheduled meeting, the Redondo Beach City Council and I received a report on Senate Bill 50. We unanimously authorized this letter expressing our opposition to SB 50.

Opposition to SB 50

As you are aware, Senate Bill 50 is intended to establish additional incentives for the development of affordable housing above those within existing Density Bonus Law. This bill would require that an eligible residential development, as defined, receive waivers from maximum controls on density, automobile parking requirements greater than 0.5 parking spots per unit, up to 3 additional incentives or concessions under the Density Bonus Law, and specified additional waivers if the residential development is located within a 1/2-mile or 1/4-mile radius of a major transit stop, as defined, further exempting developments from most height, intensity, and any parking requirements. Additionally an eligible project pursuant to this proposed legislation and Section 65913.4 may qualify for a ministerial approval. To a large extent, this proposed legislation preempts home rule that allows cities to establish and implement local zoning controls that protect the shape, form, and character of the community. Existing State law leaves zoning decisions exclusively to local governments—this is a major part of the home rule doctrine. SB 50 preempts local regulation for new infill housing close to transit. We oppose home rule preemption.

Senate Bill 50 does include provisions to encourage communities to opt for a community-led planning process to develop zoning and other policies that encourage affordable housing. Our City is currently updating its General Plan to address many local housing related concerns, consistent with the provisions within proposed Section 65918.55. Since spring 2017, a 27 member citizens General Plan Advisory Committee

has conducted 16 meetings, with 8 more scheduled, many where the focus has been on housing in Redondo Beach. The intent is to ensure that a broad range of housing types and densities are available. However, based on the proposed language of SB 50, these robust planning efforts we have undertaken would not even qualify for the option of a community-led planning process in lieu of the requirements of SB 50 because they are being conducted prior to January 1, 2020.

Redondo Beach provides for a broad range of housing types and densities. The City has also taken action to zone for higher densities around high quality transit nodes and to some extent along transit corridors. The location of the City's zoning districts that permit the highest residential densities (35 du/ac not including density bonus potential) are strategically located with respect to transit. The City's certified Housing Element identifies specific sites in strategic locations and includes specific programs for ensuring housing goals as required are achieved. Every area identified in the Housing Element has distinct challenges that require different approaches. Although Redondo Beach recognizes that transit oriented development may include high density residential development, it is not simply about allowing only more residential development, but should include job centers as well. In fact, studies show that job centers near transit increase ridership as much as, or in some cases more than, housing adjacent to transit.

Despite the city's contemporary land-use planning policies and zoning designations, the proposed legislation would replace our strategically planned, locally appropriate areas of housing intensification with a blanket policy of permitting ultra-urban development at unregulated densities--potentially converting valuable and viable job producing uses and local trip-reducing commercial uses in the process. This one size fits all approach to local land use regulation, if enacted as written, would have significant adverse impacts on our established community and its character. The proposed legislation would also have significant implications regarding traffic, parking, and other infrastructure that was designed decades ago for a suburban density.

Redondo Beach is a perfect example of a medium size coastal city striving to meet and address the housing needs of Southern California. We have every level and type of housing; singles, 1 bedrooms, 2 bedrooms, 3 bedrooms, multi-family housing, single-family housing and multi-million dollar coastal homes. Fifty percent of the housing units in the community is rental. We also have a Housing Authority with over 500 vouchers issued for Section 8 housing. We have numerous senior living complexes in all areas of town.

Like many communities in California, Redondo Beach, Hermosa Beach, and Manhattan Beach are largely 'built-out' communities with worsening traffic, impacted schools, and water shortages. However, Redondo Beach's population continues to grow, along with average household size and the number of households. We have been averaging an additional 60 units per year for the last 15 years.

SB 50 proposes that development in proximity to major transit should be exempted from local controls on maximum residential density and parking, and should relax maximum floor area ratios (FAR) to a minimum of 3.25, and allow heights in excess of 45 to 55 feet. These imposed standards are nearly two and three times our current standards for building heights and FAR. Elimination of the controls on maximum density and significantly relaxing floor area ratios and height standards would allow buildings to be constructed virtually to all property lines resulting in over-covering of public and private open space that is already in short supply in the community. Regulations on parking, which is already at a premium in some areas of our beach community, would be invalidated and the provision of adequate parking could not be ensured for new development.

While the goal of SB 50 is to establish incentives for the development of affordable housing near major transit stops and along high quality bus corridors, the unintended consequences of any such development would be extreme and severe to the local community.

Redondo Beach's population density is 11,000 residents per square mile. Our city is one of the most densely populated areas in California. Demographia.com rated Redondo Beach as 43rd in population density for U.S. Cities over 50,000 people after the 2000 census. With this population density, the City as a result has 11 Level of Service 'F' intersections and similar parking challenges. Nonetheless, the City of Redondo Beach is producing a wide variety of housing after carefully considering the suitability and impacts of each housing project. As shown below, several larger projects are under construction, approved, awaiting construction, or in the planning stages. This does not include the conversions of many single-family homes to '2 and 3 on-a-lot' developments that are occurring all over town.

- One South is a 52 unit project currently in the final stages of construction.
<https://liveonesouth.com>
- Legado Redondo will include 115 units and was approved June 2017.
<https://www.dailybreeze.com/2017/10/18/redondo-beach-oks-settlement-over-legado-development/>
- Construction is nearly completed on the Kensington Project—a 98-unit, 130 bed residential care for the elderly with a memory care facility on Pacific Coast Highway and Knob Hill, approved by the voters in 2016.
- The revitalization of our regional shopping center, The South Bay Galleria Development was approved on January 15, 2019 for 300 residential units, with 20% Low Income or 10% Very Low Income.
https://www.redondo.org/depts/community_development/planning/south_bay_galleria_draft_eir.asp

Many of the outlying cities in the LA area such as ours have a severe housing/jobs imbalance where over 90% of the residents leave their town in the morning to go to work. This creates huge impacts to our transportation sectors in one direction in the morning, to only reverse that impact during the evening commute. What these areas need is more job creating business centers to reverse some of that flow, not more housing that will only worsen the problem.

One Size Does Not Fit All

Land use decisions by communities and local officials are complex and take into account many different issues such as school capacity, financial sustainability, available park space, traffic, air pollution, water needs, sewer capacity, parking, affordability, street maintenance, commercial needs, industrial needs, access to emergency services, etc.

A one size fits all approach dictated from the State will be a disaster for many communities by exacerbating impacts that will also have consequences with State-wide interest. Water needs will increase and student/teacher ratios will deteriorate just to name two. Legislation that creates even bigger problems with State-wide interests will demand more rules and regulations to fix the problems they create.

SB 50 would serve to further the imbalance of jobs with local housing that already exists in our City. As written, these provisions may sacrifice the development of viable commercial businesses in favor of housing. As part of our ongoing General Plan Update noted earlier, a City-wide market analysis confirmed that the City is jobs-poor rather than housing-poor. Ninety-three percent of our residents commute out of our City to their jobs. Our local conditions are unique to Redondo Beach and best addressed by Redondo Beach. We do recognize our responsibility to provide housing and are continuing those efforts with regular neighborhood meetings to determine as a community how best to address our local needs, and at the same time contribute to solutions that address regional issues.

State legislation should not interfere with complex decisions best handled at the local level. Local land-use decisions should be left to local communities who must manage and maintain the towns they create.

In conclusion, housing development should be left to the local agencies that are best equipped to evaluate the impacts of projects, and can require mitigations to protect the health and safety of the residents they serve.

Sincerely,

Mayor William Brand

CC: Senator Anna Cabellero, 12th State Senate District
Senator Ben Hueso, 40th State Senate District; Chair, California Latino
Legislative Caucus
Senator John Moorlach, 37th State Senate District
Senator Nancy Skinner, 9th State Senate District
Assembly Member Autumn Burke, 62nd State Assembly District; Vice-Chair,
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Assembly Member Buffy Wicks, 15th Assembly District
Assembly Member Al Muratsuchi, 66th Assembly District
Michael J. Arnold, Michael J. Arnold & Associates
City Council Members, City of Redondo Beach