



City of La Puente

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VIA: Electronic and U.S. Regular Mail

March 4, 2020

Kome Ajise, Executive Director
Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

Bill Jahn, President
Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

Peggy Huang, CEHD Committee, Chair
Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

SUBJECT: Request to the Southern California Association of Governments (SCAG) to Amend the Regional Housing Needs Assessment (RHNA) Methodology for the 6th Cycle

Dear Messrs. Ajise and Jahn and Ms. Huang:

The City of La Puente requests that SCAG amend the RHNA methodology to reinstate local input as a factor in the existing need. The City of Cerritos recently submitted a proposal dated February 4, 2020, which recommends that household growth forecasts be reintroduced back into the calculations for the existing need as follows: household growth (33.3%), job accessibility (33.3%), and population within high quality transit areas (33.3%).

These household growth projections are an important factor in that it takes into consideration the unique characteristics of each jurisdiction. Moreover, these growth projections more closely aligns the RHNA with the development pattern established within Connect SoCal as required by state statute. Finally, as stated in the staff-recommended RHNA methodology staff report for the November 7, 2019, Regional Council meeting, the reintroduction of household growth into the existing need would further the five objectives of state housing law.

Furthermore, we are also requesting that SCAG object again to the Department of Housing and Community Development (HCD) in that they did not follow state law with the regional determination [see Government Code Section 65584.01(a)]. Even the Department of Finance recently updated its population projections and show a significant decrease since their previous forecast. Governor Newsom has also stated that his commitment to building 3.5 million homes by 2025 was a “stretch goal” and that the state would soon be releasing a more pragmatic estimate of the housing needs by region. The regional determination of 1.34 million housing units combined with an inequitable RHNA methodology are setting up local jurisdictions for failure to comply with state housing law.

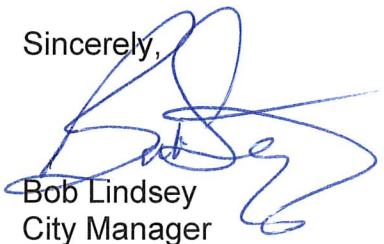
For example, for the City of La Puente’s 5th Cycle Regional Housing Needs Assessment, the total number of housing units is 818. Under the current methodology being considered by SCAG, the number more than doubles to 1,928 for a completely built out city of only 3.5 square miles in size.

In addition, we request that the CEHD Policy Committee and Regional Council fully considers the City of Cerritos letter dated March 3, 2020 which outlines the reasons why the Cerritos-proposed methodology furthers all five of the RHNA objectives more than the SCAG/HCD-Approved Methodology.

We request that the RHNA Subcommittee, CEHD Policy Committee, and Regional Council consider these two recommendations prior to the adoption of the RHNA. We recognize that there are time constraints established by state law; however, the RHNA will have significant impacts on jurisdictions over the next decade. Therefore, it is imperative that the RHNA be finalized in a way that is equitable and attainable in responding to the housing crisis.

The City thanks you in advance for taking into consideration the points raised in this letter and the two letters submitted by the City of Cerritos as referenced above.

Sincerely,



Bob Lindsey
City Manager

cc: La Puente Mayor and City Council Members
Senator Susan Rubio, 22nd Senate District
Assembly Majority Leader Ian Calderon, 57th Assembly District
Marisa Creter, Executive Director, San Gabriel Valley COG
Torrey Contreras, Senior Assistant City Manager, City of Cerritos