

[REDACTED]

From: Cassius Rutherford [REDACTED]
Sent: Monday, August 19, 2019 3:42 PM
To: Regional Housing; Ma'Ayn Johnson
Cc: manuel.chavez@costamesaca.gov; Brandon Whalen; [REDACTED]
Subject: SCAG Regional Housing Needs Assessment Should Reflect Higher Goals (letter attached)
Attachments: Letter_ SCAG Regional Housing Needs Assessment Should Reflect Higher Goals.pdf

August 19, 2019

To: RHNA Subcommittee

RE: SCAG Regional Housing Needs Assessment Should Reflect Higher Goals

Dear RHNA Subcommittee Leadership & Staff,

We write to you joining the growing coalition of housing policy experts and organizations asking that the Southern California Association of Governments (SCAG) Regional Council instruct SCAG staff to propose an allocation formula based on objective measures that align with the stated priorities of Housing Element Law. In other words, we are asking SCAG to plan for housing needs better by concentrating housing in job-rich areas and reducing sprawl. Our region needs RHNA housing targets that actually reflect the severity of our housing shortage.

We are in a severe housing crisis. According to a recent Harvard study, 46% of all residents in Los Angeles and Orange Counties spend 30% or more of their income on housing costs. The burden is most severe for renters; nearly one third (31%) of renters in Los Angeles and Orange counties pay half or more of their income on rent. This same study concluded that the Los Angeles and Orange County region is the most housing cost burdened in the nation. Homelessness in Orange County alone has increased by 43% in just the past two years, and so far this year, 113 people have died while homeless on the streets. Our dire housing crisis demands a solution of similar magnitude.

SCAG must reverse these trends and adopt policies that will allocate housing targets to promote housing density where it is needed. Using growth projections under local zoning controls as a basis for RHNA works directly against environmental and social goals because it pushes more housing to parts of the region with fewer jobs and lower incomes, furthering sprawl and worsening commute times. Many cities in Los Angeles and Orange County closest to abundant job opportunities are mostly “built out” under existing zoning, and therefore have a relatively low projected household growth. However, these cities could accommodate housing by rezoning land strategically. RHNA should push for more low- and moderate-income housing in high opportunity cities, but relying on local inputs does the opposite. It pushes housing growth to the cities farthest from job opportunities – which have more open space and vacant land available for building, and thus higher projected household growth. An over-reliance on local zoning controls has contributed to the proliferation of our housing crisis and a lack of options for renters and homeowners alike. A reliance on objective measures rather than a highly political process determined by local leaders would allocate regional housing need in a way that advances environmental sustainability, promotes equity, and affirmatively furthers a fair share of housing at the regional scale.

Assigning high RHNA numbers to cities with low housing demand unfairly punishes them, and they are less

likely to meet these production targets. Additionally, assigning low RHNA numbers to cities with high housing demand unfairly rewards them for meeting low goals that did not reflect the demands of job-rich areas. When you assign higher RHNA numbers to cities with higher demand for housing, this will actually lead to more housing production overall.

Ending our housing crisis starts with having target numbers that reflect the magnitude of our housing shortage. RHNA provides both the goal and the responsibility needed to ensure every city does its part, which is why this regional estimate is so important. We urge you to give Orange County cities RHNA housing targets that reflect the severity of the housing shortage and the urgency of the need.

Sincerely,

Manuel Chavez

Costa Mesa Council Member - District 4

manuel.chavez@costamesaca.gov

Cassius Rutherford

Parks, Arts, & Community Services Commissioner - City of Costa Mesa

Chris Gaarder

Chair, Planning Commission - City of Fullerton

Brandon Whalen-Castellanos

Chair, Transportation & Circulation Commission - City of Fullerton

Luis Aleman

Parks & Recreation Commissioner - City of Santa Ana

--- A PDF copy of our letter is attached to this email ---