

From: Eryn Block <eryn.block@palmsnc.la>
Sent: Tuesday, August 27, 2019 11:34 AM
To: Regional Housing
Cc: Jamie Poster
Subject: Letter regarding SCAG RHNA Allocation Plan from the Palms Neighborhood Council
Attachments: 2019-08-05 RHNA Letter_Final_PNC.pdf

To whom it may concern:

Please find attached a letter commenting on RHNA Allocation Plan by SCAG on behalf of the Palms Neighborhood Council.

Sincerely,

Eryn Piper Block
President
Palms Neighborhood Council
www.palmsnc.la



Date: August 7, 2019

To: Southern California Association of Governments (“SCAG”)
Attn: RHNA, 900 Wilshire Boulevard, suite 1700
Los Angeles, CA 90017

From: Eryn Block, President, Palms Neighborhood Council

Re: Proposed Regional Housing Needs Assessment (“RHNA”) Allocation Methodology

To SCAG and the Department of Housing and Community Development:

The Palms Neighborhood Council (“PNC”) represents a diverse community of approximately 44,000 West Los Angeles residents. We are multi-family residential dwellers, homeowners, businesses, schools and religious groups, proud of our diversity and engaged in the health of our city. In recent years, Palms has stepped up to recognize and embrace our position as a leader in the evolution and growth of our city to welcome more multi-family housing near our transit station.

At the same time that we are building more housing, we are also watching a growing homeless crisis evolve on our streets. The most recent homeless count in Los Angeles County was up 12% from the previous year with over 56,000 homeless individuals.¹ We are also seeing vulnerable tenants unjustly evicted from rent stabilized units and market-rate rents skyrocketing because we simply have more demand for housing than supply.

The Regional Housing Needs Assessment is mandated by State Housing Law as part of the periodic process of updating local housing elements of the General Plan. SCAG is in the process of developing the 6th cycle RHNA allocation plan which will cover the planning period October 2021 through October 2029. The State Housing Element Law through the RHNA process is intended to ensure cities plan for sufficient housing to accommodate growth. After SCAG adopts the RHNA allocation plan in October 2020, local jurisdictions will have one year to update their Housing Elements to ensure adequate zoning capacity for the allocated housing needs by income categories. The PNC believes we need ambitious housing goals that do more than just address population growth. **We need housing goals that reject the status quo wherein people are living on the street, in overcrowded conditions, or in rent burden households.** We support SCAG’s added objective for this 6th RHNA Cycle to include affirmatively furthering adequate and equitable housing.

¹ <https://www.lahsa.org/homeless-count/>

In the past two RHNA Cycles, SCAG determined 699,368 units for the 4th Cycle (2006-2014) and only 412,137 units for the 5th Cycle (2013-2021).² Given our current housing crisis, it is clear these goals were both not sufficient and also not properly enforced. The PNC was disappointed to see the housing need goals that SCAG sent to the State and believes that the numbers do not accurately reflect the current housing crisis. We hope to see SCAG set more ambitious goals for the future.

On August 1st, SCAG released three methodology options for public review and comment.

Table 1. SCAG RHNA methodology options³

	Option 1	Option 2	Option 3
Existing need separate from projected need	Yes	No	No
Higher total of lower income categories	Yes	No	No
Emphasis on High Quality Transit Areas (HQTAs)	Yes	Yes	No
Accounts for recent building activity	Yes	No	No
Social equity adjustment	Yes	Yes	Yes
Local input as a component	Yes	No	Yes

Option 1 allocates housing need due to projected growth based on local jurisdictions' local input household growth, plus adjustments for vacancy and replacement need. Existing need (need not based on projected growth) is allocated based on a local jurisdiction's share of the region's population (70%), its share of the region's population in high-quality transit areas (HQTAs, 20%), and recent new housing unit permitting relative to the regional average (10%).

Option 2 allocates all housing need based on local jurisdictions' share of the region's total population (80%) and share of the region's population in HQTAs (20%).

Option 3 allocates all housing need based on local jurisdictions' share of regional population growth based on local input. In order to account for the likely possibility that the regional housing needs determination exceeds local jurisdictions' projections for 2030, a horizon year of 2030, 2035, or 2045 can be used to accommodate regional housing needs totals of up to 1.3 million. Adjustments for vacancy and replacement need are also added in option 3.

² <http://www.scag.ca.gov/programs/Documents/RHNA/RHNA101-072919webinar.pdf>

³ <http://www.scag.ca.gov/programs/Documents/RHNA/RHNA-Final-Proposed-Methodology.pdf>

The PNC believes existing housing needs should be addressed in the methodology, so Options 2 and 3 are not acceptable. However, the existing housing needs methodology outlined in Option 1 does not calculate existing needs based on the number of people in a local jurisdiction suffering from overcrowding, rent burden or homelessness or take into account long-term affordability covenants. Any methodology that ignores these pressing issues is flawed and should be re-evaluated. The PNC strongly urges you to adjust the existing housing needs methodology so we can plan for adequate and equitable housing goals for the future.

Sincerely,

Eryn Block
President, Palms Neighborhood Council